

Armstrong, Kathy

From: Marraccini, Davina
Sent: Monday, April 09, 2018 12:22 PM
To: Simonson, Davy; O'Lone, Dan; Zapata, Cesar; Guzman, Humberto
Cc: Lincoln, Larry; Wise, Allison; Webster, James
Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Thank you, Davy. This is helpful.

-Davina

From: Simonson, Davy
Sent: Monday, April 09, 2018 12:10 PM
To: Marraccini, Davina <Marraccini.Davina@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>
Cc: Lincoln, Larry <Lincoln.Larry@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Webster, James <Webster.James@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>
Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

I have to review my written notes from this phone call and related calls I had with ADEM; they are in the office and I'm flexing today. I'll supplement this summary Tuesday a.m., once I can review my written notes in the office.

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After the call, ADEM said they are well aware of the situation and her concerns, and confirmed the health department was, too. Also, I called Dan O'Lone and let him know of the situation and that ADEM's water folks had investigated and found no violations/leakage of waste material at the RR transfer facility.

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Davy
202-510-0392

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Cc: Marraccini, Davina <Marraccini.Davina@epa.gov>
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Davy – got an update?

Dan

Daniel J. O'Lone, Acting Chief
NPDES Permitting and

Enforcement Branch
404.562.9434, (c) 404.783.8342
olone.dan@epa.gov

"The single biggest problem in communication is the illusion that it has taken place."
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Sent: Friday, April 6, 2018 2:31 PM
To: O'Lone, Dan <Olone.Dan@epa.gov>
Subject: FW: Why trainloads of other people's poo have been rotting in an Alabama town for months

Dan,

Could you check on this?

César A. Zapata
Deputy Director
Water Protection Division
United States Environmental Protection Agency, Region 4

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Subject: FW: Why trainloads of other people's poo have been rotting in an Alabama town for months

Good morning,

Per the thread below, do you know whether anyone in WPD spoke to the Mayor or Parrish, AL, about biosolids recently? If not, I wonder whether it was someone at the Center of Excellence for Biosolids in R7—do you perhaps have a contact there to check with?

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Cc: Wise, Allison <Wise.Allison@epa.gov>

Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Thanks, Larry.

Jim – let me check internally first as it may be that someone in WPD who works on biosolids spoke to her. I'll get back to you ASAP.

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Sent: Thursday, April 05, 2018 8:50 AM

To: Webster, James <Webster.James@epa.gov>

Cc: Marraccini, Davina <Marraccini.Davina@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>

Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Looping in OGR.

Larry

Director

Office of External Affairs

U.S. Environmental Protection Agency, Region 4

Phone: (404) 562-8304

Email: lincoln.larry@epa.gov

<https://www.epa.gov/aboutepa/about-epa-region-4-southeast>

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And Facebook: www.facebook.com/eparegion4

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Sent: Thursday, April 5, 2018 8:42 AM

To: Lincoln, Larry <Lincoln.Larry@epa.gov>

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jim

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<https://www.epa.gov/aboutepa/about-epa-region-4-southeast>
Follow Region 4 on Twitter: [www.twitter.com/EPASoutheast](https://twitter.com/EPASoutheast)
And Facebook: www.facebook.com/eparegion4

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From: Cheatham, Reggie
Sent: Tuesday, April 3, 2018 6:17 PM
To: Hill, Franklin <Hill.Franklin@epa.gov>
Subject: CNN: Why trainloads of other people's poo have been rotting in an Alabama town for months

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Shared from [Apple News](#)

Reggie Cheatham, Director

Office of Emergency Management, USEPA
202/564-8003(o)/202/689-9400
Doris Williams, Executive Assistant
202/564-0053

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And Facebook: www.facebook.com/eparegion4

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202/564-0053

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Thanks, Davy, for your call confirming you did speak to Mayor Hall and that you did not convey the material "wasn't dangerous" or that it was "class A biowaste," as the article reports. Please send a summary of the conversation you had to the group as soon as you're able.

Much appreciated,

-Davina

From: Marraccini, Davina
Sent: Monday, April 09, 2018 8:58 AM
To: Simonson, Davy <Simonson.Davy@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>
Cc: Lincoln, Larry <Lincoln.Larry@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Webster, James <Webster.James@epa.gov>
Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Thanks, Davy. We're trying to determine who at EPA spoke to Parrish Mayor Heather Hall and what was conveyed in the conversation. Do you know anything about that?

-Davina

From: Simonson, Davy
Sent: Monday, April 09, 2018 8:54 AM
To: Marraccini, Davina <Marraccini.Davina@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>
Cc: Lincoln, Larry <Lincoln.Larry@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Webster, James <Webster.James@epa.gov>
Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Davina, I just left you a voice mail. Please call me at 202-510-0392 for more details.

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olone.dan@epa.gov

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Water Protection Division
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Looping in OGR.

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Armstrong, Kathy

From: Guzman, Humberto
Sent: Monday, April 09, 2018 8:19 AM
To: O'Lone, Dan; Zapata, Cesar; Simonson, Davy
Cc: Marraccini, Davina; Lamberth, Larry
Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Davy has spoken to ADEM and others about this. He is on top of this issue.

Humberto

From: O'Lone, Dan
Sent: Friday, April 06, 2018 4:07 PM
To: Zapata, Cesar <Zapata.Cesar@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>
Cc: Marraccini, Davina <Marraccini.Davina@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>
Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Additionally, R7 only handles enforcement not programmatic questions.
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Dan

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Cc: Lincoln, Larry <Lincoln.Larry@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Webster, James <Webster.James@epa.gov>
Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Thank you, Dan.

And Davy, any more info you can provide about this as soon as possible is much appreciated. As this issue garners more attention in the press we want to ensure our messaging is as consistent and clear as possible.

-Davina

From: O'Lone, Dan
Sent: Friday, April 06, 2018 4:05 PM
To: Zapata, Cesar <Zapata.Cesar@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>
Cc: Marraccini, Davina <Marraccini.Davina@epa.gov>
Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

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Davy – got an update?

Dan

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404.562.9434, (c) 404.783.8342
olone.dan@epa.gov

"The single biggest problem in communication is the illusion that it has taken place."
George Bernard Shaw

From: Zapata, Cesar
Sent: Friday, April 6, 2018 2:31 PM
To: O'Lone, Dan <Olone.Dan@epa.gov>
Subject: FW: Why trainloads of other people's poo have been rotting in an Alabama town for months

Dan,

Could you check on this?

César A. Zapata
Deputy Director
Water Protection Division
United States Environmental Protection Agency, Region 4

From: Marraccini, Davina
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Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Looping in OGR.

Larry

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And Facebook: www.facebook.com/eparegion4

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Subject: FW: Why trainloads of other people's poo have been rotting in an Alabama town for months

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Sent: Tuesday, April 3, 2018 6:17 PM
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Reggie Cheatham, Director
Office of Emergency Management, USEPA
202/564-8003(o)/202/689-9400
Doris Williams, Executive Assistant
202/564-0053

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Armstrong, Kathy

From: Marraccini, Davina
Sent: Friday, April 06, 2018 4:09 PM
To: O'Lone, Dan; Zapata, Cesar; Simonson, Davy
Cc: Guzman, Humberto
Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Thanks, Dan.

From: O'Lone, Dan
Sent: Friday, April 06, 2018 4:07 PM
To: Zapata, Cesar <Zapata.Cesar@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>
Cc: Marraccini, Davina <Marraccini.Davina@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>
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Looping in OGR.

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Doris Williams, Executive Assistant
202/564-0053

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Armstrong, Kathy

From: Simonson, Davy
Sent: Tuesday, April 10, 2018 2:47 PM
To: Marraccini, Davina; O'Lone, Dan; Zapata, Cesar; Guzman, Humberto
Cc: Lincoln, Larry; Wise, Allison; Webster, James
Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Here are some additional statements from the Mayor, from both her voice mail message (3/14/18) and from my subsequent telephone conversation with her (3/16/18). These are from my written notes, to supplement my recollection of the phone conversation as described in yesterday's email (below):

- The issue was described as "transfer of sewer sludge from NYC" to a landfill (Big Sky Environmental MSWLF) about 20 minutes away from the town of Parrish, AL (Walker County).
- Rail cars holding truck trailers of the waste were being "stockpiled" in a railroad transfer yard located in the town.
- The Mayor said, "This material has greatly affected quality of life for the people in the town of Parrish. We can't go outside. Children can't play baseball because 'sewer sludge' was being stockpiled right next to a park and recreation facility".
- The "stockpiling" of the waste at the transfer yard occurred because the 'normal' transfer process was halted, due to the town of West Jefferson suing the landfill, according to the Mayor.
- She indicated litigation was over, and the transfer of the waste via truck transport of the stockpiled trailers to the landfill had commenced.
- The Mayor said that ADEM water program's Heather Byars (SP?) had recently visited the railroad transfer station in Parrish, and during her inspection found no leakage from the trailers.

From: Marraccini, Davina
Sent: Monday, April 09, 2018 12:22 PM
To: Simonson, Davy <Simonson.Davy@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>
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Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Thank you, Davy. This is helpful.

-Davina

From: Simonson, Davy
Sent: Monday, April 09, 2018 12:10 PM
To: Marraccini, Davina <Marraccini.Davina@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>
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Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

I have to review my written notes from this phone call and related calls I had with ADEM; they are in the office and I'm flexing today. I'll supplement this summary Tuesday a.m., once I can review my written notes in the office.

Meanwhile, from my recollection, the conversation included: her brief summary (she was driving) of the situation – stench from rail cars near ball fields, etc.; her statement that ADEM water folks had responded/inspected and found no leakage (I recall she stated that she was not upset with ADEM); a short confirmation of what the “transfer station” actually was/is – i.e., that it is a railyard/RR property and not a State-regulated solid waste transfer station facility (confirmed this fact with ADEM); a short discussion that AL Department of Health should be a primary contact for health concerns (considering ADEM and EPA have a limited role in this situation); I also conveyed that I had talked w/ ADEM weeks prior in the context of the landfill’s request for a permit renewal, and that the management of biosolids played a role in the State approving the renewal; I told her that I would convey her comments to ADEM (which I did).

After the call, ADEM said they are well aware of the situation and her concerns, and confirmed the health department was, too. Also, I called Dan O’Lone and let him know of the situation and that ADEM’s water folks had investigated and found no violations/leakage of waste material at the RR transfer facility.

Regarding the quotes in the article, I can positively say that I would never tell anyone that **any** classification of biosolids “wasn’t dangerous”. I’ve been to enough biosolids composting facilities over the past 20 years (and to a number of WWTPs) to ever make such a definitive statement. Also, since I did not know exactly what the source of the waste was in the trailers/railcars (or what processes that waste may or may not have undergone prior to transport) I did not provide speculation that it could be Class A biosolids vs. any other classification under part 503. Previous conversations (brief and not in great detail) that I’ve had with ADEM regarding their review of this MSWLF’s recent permit renewal request indicated that a key issue was the types of biosolids that the landfill has accepted in the past/would be allowed to accept in the future. So, she may have been referring to that topic/issue/result when quoted for the article.

Davy
202-510-0392

From: Marraccini, Davina
Sent: Monday, April 09, 2018 9:17 AM
To: Simonson, Davy <Simonson.Davy@epa.gov>; O’Lone, Dan <Olone.Dan@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>
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Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Thanks, Davy, for your call confirming you did speak to Mayor Hall and that you did not convey the material “wasn’t dangerous” or that it was “class A biowaste,” as the article reports. Please send a summary of the conversation you had to the group as soon as you’re able.

Much appreciated,

-Davina

From: Marraccini, Davina
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To: Simonson, Davy <Simonson.Davy@epa.gov>; O’Lone, Dan <Olone.Dan@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>
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Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Thanks, Davy. We're trying to determine who at EPA spoke to Parrish Mayor Heather Hall and what was conveyed in the conversation. Do you know anything about that?

-Davina

From: Simonson, Davy

Sent: Monday, April 09, 2018 8:54 AM

To: Marraccini, Davina <Marraccini.Davina@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>

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Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Davina, I just left you a voice mail. Please call me at 202-510-0392 for more details.

What I know of the situation -- A lawsuit against the MSWLF temporarily caused railcars carrying truck-trailers of NY biosolids to be 'stored' at a railroad 'transfer station' (the landfill does not have a rail spur, so trailers have to be off-loaded from the railcars and trucked to the landfill). Last I heard, the lawsuit had ended and the trailers of biosolids were beginning to be moved from the railyard transfer station/storage area to the landfill. This railcar storage area is not a solid waste transfer station that would be regulated by ADEM. I was informed that ADEM's water folks have inspected the cars/trailers to ensure no leakage, and found none. The nuisance issue of odors, as well as any potential health concerns, would fall under the AL Department of Health. One additional note, although it may not be applicable to railroad transportation or to railyards, the AL Department of Health is responsible for transportation (and collection) of solid waste in the State, rather than ADEM. ADEM informed that the Alabama health folks were aware of the situation.

I have also spoken with a citizen who had sent previous complaints/concerns to our WPD about the landfill receiving biosolids and concerns of potential threats to nearby creeks. I explained the role of local-state-federal governments in the management of solid waste, let him know that ADEM had addressed biosolids issues with the facility prior to recently renewing the permit, and provided information for him to contact the appropriate ADEM solid waste personnel and where/how he could review pertinent State documents associated with permitting and enforcement/compliance issues involving the landfill.

Davy

From: Marraccini, Davina

Sent: Friday, April 06, 2018 4:09 PM

To: O'Lone, Dan <Olone.Dan@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>

Cc: Lincoln, Larry <Lincoln.Larry@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Webster, James <Webster.James@epa.gov>

Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Adding Humberto as Dan let me know he may have also fielded a compliant about this.

-Davina

From: Marraccini, Davina

Sent: Friday, April 06, 2018 4:08 PM

To: O'Lone, Dan <Olone.Dan@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>

Cc: Lincoln, Larry <Lincoln.Larry@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Webster, James <Webster.James@epa.gov>

Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Thank you, Dan.

And Davy, any more info you can provide about this as soon as possible is much appreciated. As this issue garners more attention in the press we want to ensure our messaging is as consistent and clear as possible.

-Davina

From: O'Lone, Dan

Sent: Friday, April 06, 2018 4:05 PM

To: Zapata, Cesar <Zapata.Cesar@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>

Cc: Marraccini, Davina <Marraccini.Davina@epa.gov>

Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

The Biosolids regulations do not address "storage" only the disposal through surface application, incineration, or land fill.

Davy Simonson in RCRA has dealt with this issue specifically and may have talked to the mayor.

Davy – got an update?

Dan

Daniel J. O'Lone, Acting Chief
NPDES Permitting and
Enforcement Branch
404.562.9434, (c) 404.783.8342
olone.dan@epa.gov

"The single biggest problem in communication is the illusion that it has taken place."

George Bernard Shaw

From: Zapata, Cesar

Sent: Friday, April 6, 2018 2:31 PM

To: O'Lone, Dan <Olone.Dan@epa.gov>

Subject: FW: Why trainloads of other people's poo have been rotting in an Alabama town for months

Dan,

Could you check on this?

César A. Zapata
Deputy Director
Water Protection Division
United States Environmental Protection Agency, Region 4

From: Marraccini, Davina

Sent: Thursday, April 5, 2018 4:39 PM

To: Bragan, Mary Jo <Bragan.Maryjo@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>
Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Cesar,

I wanted to circle back on this too... Is there anyone in WPD who works on biosolids since Mike Hom retired? Or is there a POC in R7 who might have talked to the Mayor? Trying to track this info down quickly.

-Davina

From: Marraccini, Davina
Sent: Thursday, April 05, 2018 9:13 AM
To: Bragan, Mary Jo <Bragan.Maryjo@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>
Subject: FW: Why trainloads of other people's poo have been rotting in an Alabama town for months

Good morning,

Per the thread below, do you know whether anyone in WPD spoke to the Mayor or Parrish, AL, about biosolids recently? If not, I wonder whether it was someone at the Center of Excellence for Biosolids in R7—do you perhaps have a contact there to check with?

-Davina

From: Marraccini, Davina
Sent: Thursday, April 05, 2018 9:04 AM
To: Lincoln, Larry <Lincoln.Larry@epa.gov>; Webster, James <Webster.James@epa.gov>
Cc: Wise, Allison <Wise.Allison@epa.gov>
Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Thanks, Larry.

Jim – let me check internally first as it may be that someone in WPD who works on biosolids spoke to her. I'll get back to you ASAP.

-Davina

From: Lincoln, Larry
Sent: Thursday, April 05, 2018 8:50 AM
To: Webster, James <Webster.James@epa.gov>
Cc: Marraccini, Davina <Marraccini.Davina@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>
Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Looping in OGR.

Larry

Director
Office of External Affairs
U.S. Environmental Protection Agency, Region 4

Phone: (404) 562-8304
Email: lincoln.larry@epa.gov
<https://www.epa.gov/aboutepa/about-epa-region-4-southeast>
Follow Region 4 on Twitter: www.twitter.com/EPASoutheast
And Facebook: www.facebook.com/eparegion4

From: Webster, James
Sent: Thursday, April 5, 2018 8:42 AM
To: Lincoln, Larry <Lincoln.Larry@epa.gov>
Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Thanks Larry. We will reach out to ADEM, but thought it better if elected officials is left to your shop.

jim

From: Lincoln, Larry
Sent: Thursday, April 5, 2018 8:40 AM
To: Webster, James <Webster.James@epa.gov>
Subject: RE: Why trainloads of other people's poo have been rotting in an Alabama town for months

Let me check this out.

Larry

Director
Office of External Affairs
U.S. Environmental Protection Agency, Region 4
Phone: (404) 562-8304
Email: lincoln.larry@epa.gov
<https://www.epa.gov/aboutepa/about-epa-region-4-southeast>
Follow Region 4 on Twitter: www.twitter.com/EPASoutheast
And Facebook: www.facebook.com/eparegion4

From: Webster, James
Sent: Thursday, April 5, 2018 8:38 AM
To: Lincoln, Larry <Lincoln.Larry@epa.gov>
Subject: FW: Why trainloads of other people's poo have been rotting in an Alabama town for months

Larry
Can someone in your shop reach out to the Major's office to try to ascertain who, what office, at EPA she was communicating with? OEM has called Franklin twice about this. Since it is the Parris, Al Mayor this is cited, I thought it might be more appropriate for external affairs to reach out.

Jim

From: Hill, Franklin
Sent: Wednesday, April 4, 2018 9:41 AM
To: Webster, James <Webster.James@epa.gov>
Subject: FW: Why trainloads of other people's poo have been rotting in an Alabama town for months

From: Cheatham, Reggie
Sent: Tuesday, April 3, 2018 6:17 PM
To: Hill, Franklin <Hill.Franklin@epa.gov>
Subject: CNN: Why trainloads of other people's poo have been rotting in an Alabama town for months

Why trainloads of other people's poo have been rotting in an Alabama town for months
CNN

Dozens of train cars carrying 10 million pounds of poop are stranded in a rural Alabama rail yard. Technically it's biowaste, but to the 982 residents in the small town of Parrish, that's just semantics. [Read the full story](#)

Shared from [Apple News](#)

Reggie Cheatham, Director
Office of Emergency Management, USEPA
202/564-8003(o)/202/689-9400
Doris Williams, Executive Assistant
202/564-0053

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Armstrong, Kathy

From: Simonson, Davy
Sent: Monday, April 23, 2018 9:36 AM
To: Sampath, Sam; Marraccini, Davina
Cc: O'Lone, Dan; Guzman, Humberto; Lincoln, Larry; Rodgers-Smith, Delores; Anderson, Meredith; Wise, Allison; Pinkney, James; McMillan, Laura; Garnett, Becky; Davis, Molly
Subject: RE: Town of Parrish, AL

Sam, I had no comments on your edits. I was just letting Davina know that I elected to use her original as a 'clean slate' for my suggested changes, rather than the one you had made changes to. Wasn't in any way discounting yours. Thanks. - Davy

From: Sampath, Sam
Sent: Monday, April 23, 2018 9:10 AM
To: Simonson, Davy <Simonson.Davy@epa.gov>; Marraccini, Davina <Marraccini.Davina@epa.gov>
Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Garnett, Becky <Garnett.Becky@epa.gov>; Davis, Molly <Davis.Molly@epa.gov>
Subject: RE: Town of Parrish, AL

Davy/Davina,

I suggested to Davina last Friday to swap the yellow color highlighted words below to landfilled. This whole issue is related to landfill not land application that involves class A biosolids and the rest of the sentences still hold good meeting 503Regs.

Hope you agree with me.

Thanks
Sam
678-770-6180c

From: Simonson, Davy
Sent: Monday, April 23, 2018 8:55 AM
To: Marraccini, Davina <Marraccini.Davina@epa.gov>
Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Garnett, Becky <Garnett.Becky@epa.gov>; Sampath, Sam <Sampath.Sam@epa.gov>; Davis, Molly <Davis.Molly@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>
Subject: RE: Town of Parrish, AL
Importance: High

Hi Davina. Here are my recommendations. Additions are in red below. Some deletions have been made, also (and may not be indicated as would be the case using track changes). Please note I did not use the revised version that water sent to you, so their edits are not included below.

1st, 2nd, & 4th paragraphs: I suggest removing: "railcars containing biosolids" and, "biosolids contained in the railcars". These terms indicate EPA thinks that the biosolids were in boxcars or in covered open-top railcars, rather than in containers (ready for offloading and transport to the MSWLF) **sitting atop** flatbed-type railcars. I've added short, yet more-accurate language to the response.

3rd paragraph: I have removed: "including biosolids, as defined under the Resource Conservation and Recovery Act". This is not necessarily accurate. As we discussed Friday, biosolids are regulated under part 503 of the CWA. In my initial edits, I attempted to define the word "nonhazardous" from a RCRA point of view (i.e., making sure to differentiate it from RCRA subtitle C hazardous waste). The Mayor's correspondence repeatedly refers to biosolids as a "material". Upon disposal, the biosolids are a waste (and no longer a "material" that can be land applied, composted, etc.). In the context of a MSWLF accepting biosolids, some states may refer to it as a "special waste". But, nonetheless, it is a waste and not a material upon disposal. Bottom line, I believe that "nonhazardous solid waste" as written below should suffice. That is what I explained to the Mayor during our phone call (i.e., from a RCRA viewpoint). I did not attempt to speak on biosolids in great detail during our conversation.

6th paragraph (odors as a nuisance): I edited this paragraph significantly. Please call me if you wish to discuss. Thanks.

Davy (202-510-0392)

From: Marraccini, Davina

Sent: Friday, April 20, 2018 1:57 PM

To: Simonson, Davy <Simonson.Davy@epa.gov>

Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Garnett, Becky <Garnett.Becky@epa.gov>; Sampath, Sam <Sampath.Sam@epa.gov>; Davis, Molly <Davis.Molly@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>

Subject: RE: Town of Parrish, AL

Thanks to everyone who has provided input thus far. Please see the updated/edited version of the email below, and let me know of any needed changes for accuracy ASAP. I realize it's late in the day on a Friday, but would love to get back to the Cong. today if at all possible.

Paul,

Thank you for forwarding the email from Mayor Hall expressing concerns about contained biosolids on railcars that had been stranded at a rail yard in the Town of Parrish.

As the Mayor notes, and per the attached letter on behalf of the Big Sky Environmental, LLC (Big Sky) landfill to the Alabama Department of Environmental Management (ADEM), EPA understands that the last of the containers of biosolids were offloaded from the railcars and delivered to the Big Sky facility earlier this week [Note: this would now be "last week"]. The letter also notes that, in response to concerns from the public and ADEM, Big Sky will no longer accept biosolids originating from New York and New Jersey for disposal or land application at their Adamsville landfill facility.

EPA was contacted by Mayor Hall in mid-March. Staff in the Resource Conservation and Restoration Division explained EPA's limited role in managing nonhazardous solid waste; explained that railroad transfer stations and rail yards are typically not state-regulated solid waste facilities; and suggested that the best entity to address potential health concerns would be the Alabama Department of Public Health (ADPH).

EPA shared the Mayor's concerns with ADEM's solid waste management program. ADEM confirmed they were aware of the situation and the Mayor's concerns, and confirmed that ADPH was aware, too. EPA understands that in response to

concerns, ADEM's water program responded and inspected the railcars in Parrish and found no leakage from the contained biosolids.

With regard to other concerns raised in the Mayor's email, the Clean Water Act does require the written notice to the state permitting authority when biosolids are proposed to be applied to land in a different state from where it originated. There is no federal notification requirement for municipalities. Federal regulations do not limit the volume of biosolids that may be land applied.

With respect to odors, these are generally considered a nuisance that are not typically quantified/quantifiable. Moreover, since railroad transfer stations and rail yards are not state-regulated solid waste management facilities, there is no permit with provisions that would address control of nuisance odors.

EPA will continue to monitor this situation and provide input when appropriate. If you have questions or need additional information from the EPA, please do not hesitate to contact me directly.

Davina Marraccini
Public Affairs Specialist
U.S. EPA Region 4
404-562-8293 (office)
404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

*** Save trees! Please don't print this message unless necessary.

From: Simonson, Davy
Sent: Friday, April 20, 2018 10:28 AM
To: Marraccini, Davina <Marraccini.Davina@epa.gov>
Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>
Subject: RE: Town of Parrish, AL

Hi Davina.

I cut and pasted the Mayor's correspondence sent to Congressman Aderholt's field office, along with your straw response email to Paul Housel, into the attached Word document. My suggestions for your draft response email, as well as some pertinent notes, are in Track Changes.

-Davy

From: Marraccini, Davina
Sent: Thursday, April 19, 2018 1:05 PM
To: Simonson, Davy <Simonson.Davy@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>
Cc: Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James

<Pinkney.James@epa.gov>

Subject: FW: Town of Parrish, AL

All,

Please see the straw response to the Congressman's representative about the Mayor's email. I highlighted areas where I need input from either WPD or RCRA. Please send your suggestions NLT 10 am tomorrow, if possible.

DRAFT EMAIL RESPONSE:

Paul,

Thank you for forwarding the email from Mayor Hall expressing concerns about railcars containing biosolids that had been stranded in the Town of Parrish.

As the Mayor notes, and per the attached letter on behalf of Big Sky Environmental, LLC (Big Sky) to the Alabama Department of Environmental Management (ADEM), EPA understands that the biosolids contained in the railcars are in the process of being delivered to the Big Sky facility. According to the letter, the transfer is expected to be completed by May 28. [Can we confirm with ADEM what the status is and add a sentence to reflect how many rail cars have been moved?] The letter also notes that, in response to concerns from the public and ADEM, Big Sky will no longer accept biosolids originating from New York and New Jersey for disposal or land application at their Adamsville facility.

EPA was contacted by Mayor Hall in mid-March, prior to learning about Big Sky's aforementioned decisions. Staff in the Resource Conservation and Recovery Program explained EPA and ADEM's limited role. [Add language expressing what our role is from both the RCRA and water sides. Are there existing federal and/or state rules regarding where and how much of this material can be off loaded? Can we confirm this is a "non-hazardous" material and that EPA has little to no concerns? If not, what is our message? Are we aware of any notification requirements at the federal/state/local levels when the biosolids are transported into a municipality? Was EPA the source of the statement referenced by the Mayor that "we cannot measure odor"? If so can we expand upon that?]

In her email, Mayor Hall notes Big Sky Environmental is hoping to bring more material into Parrish location as a disbursement center. [Can we contact ADEM to confirm this? If true, does EPA and/or ADEM have any role?]

Lastly, the health-related concerns Mayor Hall cites, including breathing issues, would be more appropriately addressed by XX.

EPA will continue to monitor this situation and provide input when appropriate. If you have questions or need additional information from the EPA, please do not hesitate to contact me directly.

Davina Marraccini
Public Affairs Specialist
U.S. EPA Region 4
404-562-8293 (office)
404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

*** Save trees! Please don't print this message unless necessary.

Begin forwarded message:

From: "Skane, Elizabeth" <Skane.Elizabeth@epa.gov>
Date: April 16, 2018 at 4:06:42 PM EDT
To: "Marraccini, Davina" <Marraccini.Davina@epa.gov>
Cc: "Levine, Carolyn" <Levine.Carolyn@epa.gov>
Subject: FW: Town of Parrish, AL

Hi Davina, we got the inquiry below from Cong. Aderholt's Jasper, AL District Field Director. Would you be so kind as to follow up directly with the staffer at your earliest convenience? Many thanks!

Cc Carolyn for OLEM awareness

Best,
Elizabeth

Elizabeth Skane ♦ 202.564.5696
US Environmental Protection Agency
Office of Congressional Affairs
WJC North 3443S

From: Eades, Cassaundra On Behalf Of OCIRmail
Sent: Monday, April 16, 2018 2:58 PM
To: Skane, Elizabeth <Skane.Elizabeth@epa.gov>; Borum, Denis <Borum.Denis@epa.gov>; Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>
Subject: FW: Town of Parrish, AL

From: Housel, Paul [mailto:Paul.Housel@mail.house.gov]
Sent: Thursday, March 01, 2018 12:05 PM
To: OCIRmail <OCIRmail@epa.gov>
Subject: Town of Parrish, AL

We received the following email from the Mayor of Parrish. Any direction or assistance you can provide will be greatly appreciated.

I would like to try to explain the situation we are facing here in Parrish. Unbeknownst to anyone in the Town of Parrish, including the mayor's office, containers of Bio-solids (also known as sewer sludge) started arriving at the Norfolk Southern rail yard sometime at the end of January. Currently there are 42 train cars, each has 6 containers, each container holds 20 tons of material (or 40,000 pounds) of material. So there is approximately 10,080,000 pounds of human waste, bio-solids, or sewage sludge here in Parrish. Yes you read that correctly 10 million pounds.

My understanding is this is a non-hazardous material. And the EPA and ADEM have little to no concerns about this material. So even though there is such a large amount they are not offering any help to the Town of Parrish. I understand that this material may not be harmful to the environment. But what about the quality of life of the people of Parrish? The odor/stench off of this material is horrendous. I am not for hyperbole, so please understand that I am not exaggerating when I tell you at times it smells as if there are rotting carcasses all over the town of Parrish. This is not an everyday occurrence....but it has happened 3 days in the last week. This stench is also not just a

"whiff" or light smell. The stench is overpowering and nauseating. It is causing the residents of Parrish to barricade inside. They can not go outside to sit on their porch, or work in their yards. The fumes permeate the entire town!

Next door to the Rail yard is where Parrish Park and Rec play baseball and softball. Children are being subjected to this stench! Our Spring Festival will be held at the old Parrish High School and it is adjacent to the Rail Road. The Ultimate Fair will be here in July. Can you imagine the problem if the temperatures are in the 90's? It will be a nightmare for the people of Parrish.

The Town of Parrish has been thrust into an unfair and uninvited situation. We have large corporations shipping this waste material into municipalities and very little can be done to fight it. Most rural towns like Parrish do not have zoning laws and regulations (something I am hoping to fix). Incredibly, this material can be shipped into a municipality and not a word needs to be said to any municipal official. These are things that need to change.

Smaller towns do not have the funds to fight these legal battles, and I believe that is one reason this happens. I hope that someone in Washington DC is listening and can truly understand the situation that I am facing. My question is this....is not the quality of life for the Town of Parrish just as important as Birmingham? Tuscaloosa? This material should not be allowed to enter any municipal district! The size of the town should not matter. And their ability to pay an attorney to fight the situation should not be the determining factor as to whether this type of material should be allowed to stay inside a town's boundaries!

You would think that this is common sense. However, I have had little to no help from ADEM, Health officials, or the EPA. We have people in Parrish who are having difficulty breathing due to the noxious fumes this material is putting off and I can get no help from these offices. I was told that "we can't measure odor". A person with respiratory issues can have a problem with their breathing when there are noxious fumes or even perfume in the air! I have several people complaining of breathing issues, but still we are receiving no help from the agencies that are supposed to be protecting the citizens.

I am hoping that the situation here in Parrish will shed light on this problem. I would like to see new guidelines in regards to where and how much of this material can be off loaded. It should never be allowed to be off loaded in a populated area. It is a health hazard and an incredible nuisance. I just can not stress to you enough how detrimentally this has affected the quality of life for the residents of Parrish.

As an update....the containers have finally been given approval to be transferred to Adamsville. However, Big Sky Environmental is hoping to bring more material into Parrish and use our location as a dispersment center. We will be fighting that.

Thank you for your time,
Heather Hall
Mayor
Town of Parrish

Paul Housel
District Field Director

Office of Congressman Robert Aderholt
1710 Alabama Avenue, Room 247
Jasper, AL 35501
Phone: 205-221-2310
Fax: 205-221-9035

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Armstrong, Kathy

From: Garnett, Becky
Sent: Monday, April 23, 2018 9:15 AM
To: Marraccini, Davina; Sampath, Sam
Cc: Simonson, Davy; O'Lone, Dan; Guzman, Humberto; Lincoln, Larry; Rodgers-Smith, Delores; Anderson, Meredith; Wise, Allison; Pinkney, James; McMillan, Laura; Davis, Molly
Subject: RE: Town of Parrish, AL

The letter looks good to me with Sam and Davy's distinctions. Thanks, all!

Becky
 2-8083

From: Marraccini, Davina
Sent: Monday, April 23, 2018 9:11 AM
To: Sampath, Sam <Sampath.Sam@epa.gov>
Cc: Simonson, Davy <Simonson.Davy@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Garnett, Becky <Garnett.Becky@epa.gov>; Davis, Molly <Davis.Molly@epa.gov>
Subject: Re: Town of Parrish, AL

Yes, I will incorporate your suggestion in the final Sam.

Sent from my iPhone

On Apr 23, 2018, at 9:09 AM, Sampath, Sam <Sampath.Sam@epa.gov> wrote:

Davy/Davina,

I suggested to Davina last Friday to swap the yellow color highlighted words below to landfilled. This whole issue is related to landfill not land application that involves class A biosolids and the rest of the sentences still hold good meeting 503Regs.

Hope you agree with me.

Thanks
 Sam
 678-770-6180c

From: Simonson, Davy
Sent: Monday, April 23, 2018 8:55 AM
To: Marraccini, Davina <Marraccini.Davina@epa.gov>
Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Garnett, Becky

<Garnett.Becky@epa.gov>; Sampath, Sam <Sampath.Sam@epa.gov>; Davis, Molly
<Davis.Molly@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>

Subject: RE: Town of Parrish, AL

Importance: High

Hi Davina. Here are my recommendations. Additions are in red below. Some deletions have been made, also (and may not be indicated as would be the case using track changes). Please note I did not use the revised version that water sent to you, so their edits are not included below.

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6th paragraph (odors as a nuisance): I edited this paragraph significantly. Please call me if you wish to discuss. Thanks.

Davy (202-510-0392)

From: Marraccini, Davina

Sent: Friday, April 20, 2018 1:57 PM

To: Simonson, Davy <Simonson.Davy@epa.gov>

Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Garnett, Becky <Garnett.Becky@epa.gov>; Sampath, Sam <Sampath.Sam@epa.gov>; Davis, Molly <Davis.Molly@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>

Subject: RE: Town of Parrish, AL

Thanks to everyone who has provided input thus far. Please see the updated/edited version of the email below, and let me know of any needed changes for accuracy ASAP. I realize it's late in the day on a Friday, but would love to get back to the Cong. today if at all possible.

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As the Mayor notes, and per the attached letter on behalf of the Big Sky Environmental, LLC (Big Sky) landfill to the Alabama Department of Environmental Management (ADEM), EPA understands that the

last of the containers of biosolids were offloaded from the railcars and delivered to the Big Sky facility earlier this week [Note: this would now be "last week"]. The letter also notes that, in response to concerns from the public and ADEM, Big Sky will no longer accept biosolids originating from New York and New Jersey for disposal or land application at their Adamsville landfill facility.

EPA was contacted by Mayor Hall in mid-March. Staff in the Resource Conservation and Restoration Division explained EPA's limited role in managing nonhazardous solid waste; explained that railroad transfer stations and rail yards are typically not state-regulated solid waste facilities; and suggested that the best entity to address potential health concerns would be the Alabama Department of Public Health (ADPH).

EPA shared the Mayor's concerns with ADEM's solid waste management program. ADEM confirmed they were aware of the situation and the Mayor's concerns, and confirmed that ADPH was aware, too. EPA understands that in response to concerns, ADEM's water program responded and inspected the railcars in Parrish and found no leakage from the contained biosolids.

With regard to other concerns raised in the Mayor's email, the Clean Water Act does require the written notice to the state permitting authority when biosolids are proposed to be applied to land in a different state from where it originated. There is no federal notification requirement for municipalities. Federal regulations do not limit the volume of biosolids that may be land applied.

With respect to odors, these are generally considered a nuisance that are not typically quantified/quantifiable. Moreover, since railroad transfer stations and rail yards are not state-regulated solid waste management facilities, there is no permit with provisions that would address control of nuisance odors.

EPA will continue to monitor this situation and provide input when appropriate. If you have questions or need additional information from the EPA, please do not hesitate to contact me directly.

Davina Marraccini
Public Affairs Specialist
U.S. EPA Region 4
404-562-8293 (office)
404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

*** Save trees! Please don't print this message unless necessary.

From: Simonson, Davy
Sent: Friday, April 20, 2018 10:28 AM
To: Marraccini, Davina <Marraccini.Davina@epa.gov>
Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>
Subject: RE: Town of Parrish, AL

Hi Davina.

I cut and pasted the Mayor's correspondence sent to Congressman Aderholt's field office, along with your straw response email to Paul Housel, into the attached Word document. My suggestions for your draft response email, as well as some pertinent notes, are in Track Changes.

-Davy

From: Marraccini, Davina

Sent: Thursday, April 19, 2018 1:05 PM

To: Simonson, Davy <Simonson.Davy@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>

Cc: Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>

Subject: FW: Town of Parrish, AL

All,

Please see the straw response to the Congressman's representative about the Mayor's email. I highlighted areas where I need input from either WPD or RCRA. Please send your suggestions NLT 10 am tomorrow, if possible.

DRAFT EMAIL RESPONSE:

Paul,

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EPA was contacted by Mayor Hall in mid-March, prior to learning about Big Sky's aforementioned decisions. Staff in the Resource Conservation and Recovery Program explained EPA and ADEM's limited role. [Add language expressing what our role is from both the RCRA and water sides. Are there existing federal and/or state rules regarding where and how much of this material can be off loaded? Can we confirm this is a "non-hazardous" material and that EPA has little to no concerns? If not, what is our message? Are we aware of any notification requirements at the federal/state/local levels when the biosolids are transported into a municipality? Was EPA the source of the statement referenced by the Mayor that "we cannot measure odor"? If so can we expand upon that?]

In her email, Mayor Hall notes Big Sky Environmental is hoping to bring more material into Parrish location as a disbursement center. [Can we contact ADEM to confirm this? If true, does EPA and/or ADEM have any role?]

Lastly, the health-related concerns Mayor Hall cites, including breathing issues, would be more appropriately addressed by XX.

EPA will continue to monitor this situation and provide input when appropriate. If you have questions or need additional information from the EPA, please do not hesitate to contact me directly.

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U.S. EPA Region 4
404-562-8293 (office)
404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

*** Save trees! Please don't print this message unless necessary.

Begin forwarded message:

From: "Skane, Elizabeth" <Skane.Elizabeth@epa.gov>
Date: April 16, 2018 at 4:06:42 PM EDT
To: "Marraccini, Davina" <Marraccini.Davina@epa.gov>
Cc: "Levine, Carolyn" <Levine.Carolyn@epa.gov>
Subject: FW: Town of Parrish, AL

Hi Davina, we got the inquiry below from Cong. Aderholt's Jasper, AL District Field Director. Would you be so kind as to follow up directly with the staffer at your earliest convenience? Many thanks!

Cc Carolyn for OLEM awareness

Best,
Elizabeth

Elizabeth Skane ♦ 202.564.5696
US Environmental Protection Agency
Office of Congressional Affairs
WJC North 3443S

From: Eades, Cassaundra On Behalf Of OCIRmail
Sent: Monday, April 16, 2018 2:58 PM
To: Skane, Elizabeth <Skane.Elizabeth@epa.gov>; Borum, Denis <Borum.Denis@epa.gov>; Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>
Subject: FW: Town of Parrish, AL

From: Housel, Paul [<mailto:Paul.Housel@mail.house.gov>]
Sent: Thursday, March 01, 2018 12:05 PM
To: OCIRmail <OCIRmail@epa.gov>
Subject: Town of Parrish, AL

We received the following email from the Mayor of Parrish. Any direction or assistance you can provide will be greatly appreciated.

I would like to try to explain the situation we are facing here in Parrish. Unbeknownst to anyone in the Town of Parrish, including the mayor's office, containers of Bio-solids (also known as sewer sludge) started arriving at the Norfolk Southern rail yard sometime at the end of January. Currently there are 42 train cars, each has 6 containers, each container holds 20 tons of material (or 40,000 pounds) of material. So there is approximately 10,080,000 pounds of human waste, bio-solids, or sewage sludge here in Parrish. Yes you read that correctly 10 million pounds.

My understanding is this is a non-hazardous material. And the EPA and ADEM have little to no concerns about this material. So even though there is such a large amount they are not offering any help to the Town of Parrish. I understand that this material may not be harmful to the environment. But what about the quality of life of the people of Parrish? The odor/stench off of this material is horrendous. I am not for hyperbole, so please understand that I am not exaggerating when I tell you at times it smells as if there are rotting carcasses all over the town of Parrish. This is not an everyday occurrence....but it has happened 3 days in the last week. This stench is also not just a "whiff" or light smell. The stench is overpowering and nauseating. It is causing the residents of Parrish to barricade inside. They can not go outside to sit on their porch, or work in their yards. The fumes permeate the entire town!

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The Town of Parrish has been thrust into an unfair and uninvited situation. We have large corporations shipping this waste material into municipalities and very little can be done to fight it. Most rural towns like Parrish do not have zoning laws and regulations (something I am hoping to fix). Incredibly, this material can be shipped into a municipality and not a word needs to be said to any municipal official. These are things that need to change.

Smaller towns do not have the funds to fight these legal battles, and I believe that is one reason this happens. I hope that someone in Washington DC is listening and can truly understand the situation that I am facing. My question is this....is not the quality of life for the Town of Parrish just as important as Birmingham? Tuscaloosa? This material should not be allowed to enter any municipal district! The size of the town should not matter. And their ability to pay an attorney to fight the situation should not be the determining factor as to whether this type of material should be allowed to stay inside a town's boundaries!

You would think that this is common sense. However, I have had little to no help from ADEM, Health officials, or the EPA. We have people in Parrish who are having difficulty breathing due to the noxious fumes this material is putting off and I can get no help from these offices. I was told that "we can't measure odor". A person with respiratory issues can have a problem with their breathing when there are noxious fumes or even perfume in the air! I have several people complaining of breathing issues, but still we are receiving no help from the agencies that are supposed to be protecting the citizens.

I am hoping that the situation here in Parrish will shed light on this problem. I would like to see new guidelines in regards to where and how much of this material can be off loaded. It should never be allowed to be off loaded in a populated area. It is a health hazard and an incredible nuisance. I just can not stress to you enough how detrimentally this has affected the quality of life for the residents of Parrish.

As an update....the containers have finally been given approval to be transferred to Adamsville. However, Big Sky Environmental is hoping to bring more material into Parrish and use our location as a dispersment center. We will be fighting that.

Thank you for your time,
Heather Hall
Mayor
Town of Parrish

Paul Housel
District Field Director
Office of Congressman Robert Aderholt
1710 Alabama Avenue, Room 247
Jasper, AL 35501
Phone: 205-221-2310
Fax: 205-221-9035

BLANK PAGE

Armstrong, Kathy

From: Marraccini, Davina
Sent: Monday, April 23, 2018 9:11 AM
To: Sampath, Sam
Cc: Simonson, Davy; O'Lone, Dan; Guzman, Humberto; Lincoln, Larry; Rodgers-Smith, Delores; Anderson, Meredith; Wise, Allison; Pinkney, James; McMillan, Laura; Garnett, Becky; Davis, Molly
Subject: Re: Town of Parrish, AL

Yes, I will incorporate your suggestion in the final Sam.

Sent from my iPhone

On Apr 23, 2018, at 9:09 AM, Sampath, Sam <Sampath.Sam@epa.gov> wrote:

Davy/Davina,

I suggested to Davina last Friday to swap the yellow color highlighted words below to **landfilled**. This whole issue is related to landfill not land application that involves class A biosolids and the rest of the sentences still hold good meeting 503Regs.

Hope you agree with me.

Thanks

Sam

678-770-6180c

From: Simonson, Davy

Sent: Monday, April 23, 2018 8:55 AM

To: Marraccini, Davina <Marraccini.Davina@epa.gov>

Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Garnett, Becky <Garnett.Becky@epa.gov>; Sampath, Sam <Sampath.Sam@epa.gov>; Davis, Molly <Davis.Molly@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>

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Importance: High

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Subject: RE: Town of Parrish, AL

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Davina Marraccini
Public Affairs Specialist
U.S. EPA Region 4

404-562-8293 (office)

404-387-4368 (cell)

404-562-8335 (fax)

marraccini.davina@epa.gov

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Sent: Friday, April 20, 2018 10:28 AM

To: Marraccini, Davina <Marraccini.Davina@epa.gov>

Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>

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404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

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Begin forwarded message:

From: "Skane, Elizabeth" <Skane.Elizabeth@epa.gov>
Date: April 16, 2018 at 4:06:42 PM EDT
To: "Marraccini, Davina" <Marraccini.Davina@epa.gov>
Cc: "Levine, Carolyn" <Levine.Carolyn@epa.gov>
Subject: FW: Town of Parrish, AL

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Cc Carolyn for OLEM awareness

Best,

Elizabeth

Elizabeth Skane ♦ 202.564.5696

US Environmental Protection Agency
Office of Congressional Affairs
WJC North 34435

From: Eades, Cassaundra On Behalf Of OCIRmail
Sent: Monday, April 16, 2018 2:58 PM
To: Skane, Elizabeth <Skane.Elizabeth@epa.gov>; Borum, Denis <Borum.Denis@epa.gov>; Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>
Subject: FW: Town of Parrish, AL

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To: OCIRmail <OCIRmail@epa.gov>
Subject: Town of Parrish, AL

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Thank you for your time,

Heather Hall

Mayor

Town of Parrish

Paul Housel

District Field Director

Office of Congressman Robert Aderholt

1710 Alabama Avenue, Room 247

Jasper, AL 35501

Phone: 205-221-2310

Fax: 205-221-9035

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Armstrong, Kathy

From: Sampath, Sam
Sent: Monday, April 23, 2018 9:10 AM
To: Simonson, Davy; Marraccini, Davina
Cc: O'Lone, Dan; Guzman, Humberto; Lincoln, Larry; Rodgers-Smith, Delores; Anderson, Meredith; Wise, Allison; Pinkney, James; McMillan, Laura; Garnett, Becky; Davis, Molly
Subject: RE: Town of Parrish, AL

Davy/Davina,

I suggested to Davina last Friday to swap the yellow color highlighted words below to **landfilled**. This whole issue is related to landfill not land application that involves class A biosolids and the rest of the sentences still hold good meeting 503Regs.

Hope you agree with me.

Thanks
 Sam
 678-770-6180c

From: Simonson, Davy
Sent: Monday, April 23, 2018 8:55 AM
To: Marraccini, Davina <Marraccini.Davina@epa.gov>
Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Garnett, Becky <Garnett.Becky@epa.gov>; Sampath, Sam <Sampath.Sam@epa.gov>; Davis, Molly <Davis.Molly@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>
Subject: RE: Town of Parrish, AL
Importance: High

Hi Davina. Here are my recommendations. Additions are in red below. Some deletions have been made, also (and may not be indicated as would be the case using track changes). Please note I did not use the revised version that water sent to you, so their edits are not included below.

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Davy (202-510-0392)

From: Marraccini, Davina

Sent: Friday, April 20, 2018 1:57 PM

To: Simonson, Davy <Simonson.Davy@epa.gov>

Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Garnett, Becky <Garnett.Becky@epa.gov>; Sampath, Sam <Sampath.Sam@epa.gov>; Davis, Molly <Davis.Molly@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>

Subject: RE: Town of Parrish, AL

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EPA was contacted by Mayor Hall in mid-March. Staff in the Resource Conservation and Restoration Division explained EPA's limited role in managing nonhazardous solid waste; explained that railroad transfer stations and rail yards are typically not state-regulated solid waste facilities; and suggested that the best entity to address potential health concerns would be the Alabama Department of Public Health (ADPH).

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With regard to other concerns raised in the Mayor's email, the Clean Water Act does require the written notice to the state permitting authority when biosolids are proposed to be applied to land in a different state from where it originated. There is no federal notification requirement for municipalities. Federal regulations do not limit the volume of biosolids that may be land applied.

With respect to odors, these are generally considered a nuisance that are not typically quantified/quantifiable. Moreover, since railroad transfer stations and rail yards are not state-regulated solid waste management facilities, there is no permit with provisions that would address control of nuisance odors.

EPA will continue to monitor this situation and provide input when appropriate. If you have questions or need additional information from the EPA, please do not hesitate to contact me directly.

Davina Marraccini
Public Affairs Specialist
U.S. EPA Region 4
404-562-8293 (office)
404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

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From: Simonson, Davy
Sent: Friday, April 20, 2018 10:28 AM
To: Marraccini, Davina <Marraccini.Davina@epa.gov>
Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>
Subject: RE: Town of Parrish, AL

Hi Davina.

I cut and pasted the Mayor's correspondence sent to Congressman Aderholt's field office, along with your straw response email to Paul Housel, into the attached Word document. My suggestions for your draft response email, as well as some pertinent notes, are in Track Changes.

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From: Marraccini, Davina
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To: Simonson, Davy <Simonson.Davy@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>
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Subject: FW: Town of Parrish, AL

All,

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DRAFT EMAIL RESPONSE:

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In her email, Mayor Hall notes Big Sky Environmental is hoping to bring more material into Parrish location as a disbursement center. [Can we contact ADEM to confirm this? If true, does EPA and/or ADEM have any role?]

Lastly, the health-related concerns Mayor Hall cites, including breathing issues, would be more appropriately addressed by XX.

EPA will continue to monitor this situation and provide input when appropriate. If you have questions or need additional information from the EPA, please do not hesitate to contact me directly.

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U.S. EPA Region 4
404-562-8293 (office)
404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

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Begin forwarded message:

From: "Skane, Elizabeth" <Skane.Elizabeth@epa.gov>
Date: April 16, 2018 at 4:06:42 PM EDT
To: "Marraccini, Davina" <Marraccini.Davina@epa.gov>
Cc: "Levine, Carolyn" <Levine.Carolyn@epa.gov>
Subject: FW: Town of Parrish, AL

Hi Davina, we got the inquiry below from Cong. Aderholt's Jasper, AL District Field Director. Would you be so kind as to follow up directly with the staffer at your earliest convenience? Many thanks!

Cc Carolyn for OLEM awareness

Best,
Elizabeth

Elizabeth Skane • 202.564.5696

From: Eades, Cassaundra On Behalf Of OCIRmail

Sent: Monday, April 16, 2018 2:58 PM

To: Skane, Elizabeth <Skane.Elizabeth@epa.gov>; Borum, Denis <Borum.Denis@epa.gov>; Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>

Subject: FW: Town of Parrish, AL

From: Housel, Paul [<mailto:Paul.Housel@mail.house.gov>]

Sent: Thursday, March 01, 2018 12:05 PM

To: OCIRmail <OCIRmail@epa.gov>

Subject: Town of Parrish, AL

We received the following email from the Mayor of Parrish. Any direction or assistance you can provide will be greatly appreciated.

I would like to try to explain the situation we are facing here in Parrish. Unbeknownst to anyone in the Town of Parrish, including the mayor's office, containers of Bio-solids (also known as sewer sludge) started arriving at the Norfolk Southern rail yard sometime at the end of January. Currently there are 42 train cars, each has 6 containers, each container holds 20 tons of material (or 40,000 pounds) of material. So there is approximately 10,080,000 pounds of human waste, bio-solids, or sewage sludge here in Parrish. Yes you read that correctly 10 million pounds.

My understanding is this is a non-hazardous material. And the EPA and ADEM have little to no concerns about this material. So even though there is such a large amount they are not offering any help to the Town of Parrish. I understand that this material may not be harmful to the environment. But what about the quality of life of the people of Parrish? The odor/stench off of this material is horrendous. I am not for hyperbole, so please understand that I am not exaggerating when I tell you at times it smells as if there are rotting carcasses all over the town of Parrish. This is not an everyday occurrence....but it has happened 3 days in the last week. This stench is also not just a "whiff" or light smell. The stench is overpowering and nauseating. It is causing the residents of Parrish to barricade inside. They can not go outside to sit on their porch, or work in their yards. The fumes permeate the entire town!

Next door to the Rail yard is where Parrish Park and Rec play baseball and softball. Children are being subjected to this stench! Our Spring Festival will be held at the old Parrish High School and it is adjacent to the Rail Road. The Ultimate Fair will be here in July. Can you imagine the problem if the temperatures are in the 90's? It will be a nightmare for the people of Parrish.

The Town of Parrish has been thrust into an unfair and uninvited situation. We have large corporations shipping this waste material into municipalities and very little can be done to fight it. Most rural towns like Parrish do not have zoning laws and regulations (something I am hoping to fix). Incredibly, this material can be shipped into a municipality

and not a word needs to be said to any municipal official. These are things that need to change.

Smaller towns do not have the funds to fight these legal battles, and I believe that is one reason this happens. I hope that someone in Washington DC is listening and can truly understand the situation that I am facing. My question is this....is not the quality of life for the Town of Parrish just as important as Birmingham? Tuscaloosa? This material should not be allowed to enter any municipal district! The size of the town should not matter. And their ability to pay an attorney to fight the situation should not be the determining factor as to whether this type of material should be allowed to stay inside a town's boundaries!

You would think that this is common sense. However, I have had little to no help from ADEM, Health officials, or the EPA. We have people in Parrish who are having difficulty breathing due to the noxious fumes this material is putting off and I can get no help from these offices. I was told that "we can't measure odor". A person with respiratory issues can have a problem with their breathing when there are noxious fumes or even perfume in the air! I have several people complaining of breathing issues, but still we are receiving no help from the agencies that are supposed to be protecting the citizens.

I am hoping that the situation here in Parrish will shed light on this problem. I would like to see new guidelines in regards to where and how much of this material can be off loaded. It should never be allowed to be off loaded in a populated area. It is a health hazard and an incredible nuisance. I just can not stress to you enough how detrimentally this has affected the quality of life for the residents of Parrish.

As an update....the containers have finally been given approval to be transferred to Adamsville. However, Big Sky Environmental is hoping to bring more material into Parrish and use our location as a dispersment center. We will be fighting that.

Thank you for your time,
Heather Hall
Mayor
Town of Parrish

Paul Housel
District Field Director
Office of Congressman Robert Aderholt
1710 Alabama Avenue, Room 247
Jasper, AL 35501
Phone: 205-221-2310
Fax: 205-221-9035

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Elizabeth

Elizabeth Skane ♦ 202.564.5696
US Environmental Protection Agency
Office of Congressional Affairs
WJC North 3443S

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Sent: Monday, April 16, 2018 2:58 PM
To: Skane, Elizabeth <Skane.Elizabeth@epa.gov>; Borum, Denis <Borum.Denis@epa.gov>; Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>
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Thank you for your time,
Heather Hall
Mayor
Town of Parrish

Paul Housel
District Field Director
Office of Congressman Robert Aderholt
1710 Alabama Avenue, Room 247
Jasper, AL 35501
Phone: 205-221-2310
Fax: 205-221-9035

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Armstrong, Kathy

From: Guzman, Humberto
Sent: Friday, April 20, 2018 2:16 PM
To: Marraccini, Davina
Subject: RE: Town of Parrish, AL

I'm ok with your email.

From: Marraccini, Davina
Sent: Friday, April 20, 2018 1:57 PM
To: Simonson, Davy <Simonson.Davy@epa.gov>
Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Garnett, Becky <Garnett.Becky@epa.gov>; Sampath, Sam <Sampath.Sam@epa.gov>; Davis, Molly <Davis.Molly@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>
Subject: RE: Town of Parrish, AL

Thanks to everyone who has provided input thus far. Please see the updated/edited version of the email below, and let me know of any needed changes for accuracy ASAP. I realize it's late in the day on a Friday, but would love to get back to the Cong. today if at all possible.

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Davina Marraccini
Public Affairs Specialist
U.S. EPA Region 4
404-562-8293 (office)
404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

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From: Simonson, Davy
Sent: Friday, April 20, 2018 10:28 AM
To: Marraccini, Davina <Marraccini.Davina@epa.gov>
Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>
Subject: RE: Town of Parrish, AL

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I cut and pasted the Mayor's correspondence sent to Congressman Aderholt's field office, along with your straw response email to Paul Housel, into the attached Word document. My suggestions for your draft response email, as well as some pertinent notes, are in Track Changes.

-Davy

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Sent: Thursday, April 19, 2018 1:05 PM
To: Simonson, Davy <Simonson.Davy@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>
Cc: Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>
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All,

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Davina Marraccini
Public Affairs Specialist
U.S. EPA Region 4
404-562-8293 (office)
404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

*** Save trees! Please don't print this message unless necessary.

Begin forwarded message:

From: "Skane, Elizabeth" <Skane.Elizabeth@epa.gov>
Date: April 16, 2018 at 4:06:42 PM EDT
To: "Marraccini, Davina" <Marraccini.Davina@epa.gov>
Cc: "Levine, Carolyn" <Levine.Carolyn@epa.gov>
Subject: FW: Town of Parrish, AL

Hi Davina, we got the inquiry below from Cong. Aderholt's Jasper, AL District Field Director. Would you be so kind as to follow up directly with the staffer at your earliest convenience? Many thanks!

Cc Carolyn for OLEM awareness

Best,
Elizabeth

Elizabeth Skane ♦ 202.564.5696

US Environmental Protection Agency
Office of Congressional Affairs
WJC North 34435

From: Eades, Cassaundra On Behalf Of OCIRmail

Sent: Monday, April 16, 2018 2:58 PM

To: Skane, Elizabeth <Skane.Elizabeth@epa.gov>; Borum, Denis <Borum.Denis@epa.gov>; Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>

Subject: FW: Town of Parrish, AL

From: Housel, Paul [<mailto:Paul.Housel@mail.house.gov>]

Sent: Thursday, March 01, 2018 12:05 PM

To: OCIRmail <OCIRmail@epa.gov>

Subject: Town of Parrish, AL

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Next door to the Rail yard is where Parrish Park and Rec play baseball and softball. Children are being subjected to this stench! Our Spring Festival will be held at the old Parrish High School and it is adjacent to the Rail Road. The Ultimate Fair will be here in July. Can you imagine the problem if the temperatures are in the 90's? It will be a nightmare for the people of Parrish.

The Town of Parrish has been thrust into an unfair and uninvited situation. We have large corporations shipping this waste material into municipalities and very little can be done to fight it. Most rural towns like Parrish do not have zoning laws and regulations (something I am hoping to fix). Incredibly, this material can be shipped into a municipality and not a word needs to be said to any municipal official. These are things that need to change.

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Thank you for your time,
Heather Hall
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Paul Housel
District Field Director
Office of Congressman Robert Aderholt
1710 Alabama Avenue, Room 247
Jasper, AL 35501
Phone: 205-221-2310
Fax: 205-221-9035

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Armstrong, Kathy

From: Sampath, Sam
Sent: Friday, April 20, 2018 2:08 PM
To: Marraccini, Davina; Simonson, Davy
Cc: O'Lone, Dan; Guzman, Humberto; Lincoln, Larry; Rodgers-Smith, Delores; Anderson, Meredith; Wise, Allison; Pinkney, James; McMillan, Laura; Garnett, Becky; Davis, Molly; Wise, Allison
Subject: RE: Town of Parrish, AL

Davina,

The highlighted below should be replaced with the following:

landfilled

From: Marraccini, Davina
Sent: Friday, April 20, 2018 1:57 PM
To: Simonson, Davy <Simonson.Davy@epa.gov>
Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Garnett, Becky <Garnett.Becky@epa.gov>; Sampath, Sam <Sampath.Sam@epa.gov>; Davis, Molly <Davis.Molly@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>
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U.S. EPA Region 4
404-562-8293 (office)
404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

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From: Simonson, Davy
Sent: Friday, April 20, 2018 10:28 AM
To: Marraccini, Davina <Marraccini.Davina@epa.gov>
Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>
Subject: RE: Town of Parrish, AL

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To: Simonson, Davy <Simonson.Davy@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>
Cc: Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson,

Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>

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404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

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Begin forwarded message:

From: "Skane, Elizabeth" <Skane.Elizabeth@epa.gov>
Date: April 16, 2018 at 4:06:42 PM EDT
To: "Marraccini, Davina" <Marraccini.Davina@epa.gov>
Cc: "Levine, Carolyn" <Levine.Carolyn@epa.gov>
Subject: FW: Town of Parrish, AL

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Cc Carolyn for OLEM awareness

Best,
Elizabeth

Elizabeth Skane ♦ 202.564.5696
US Environmental Protection Agency
Office of Congressional Affairs
WJC North 34435

From: Eades, Cassandra **On Behalf Of** OCIRmail
Sent: Monday, April 16, 2018 2:58 PM
To: Skane, Elizabeth <Skane.Elizabeth@epa.gov>; Borum, Denis <Borum.Denis@epa.gov>; Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>
Subject: FW: Town of Parrish, AL

From: Housel, Paul [mailto:Paul.Housel@mail.house.gov]
Sent: Thursday, March 01, 2018 12:05 PM
To: OCIRmail <OCIRmail@epa.gov>
Subject: Town of Parrish, AL

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Paul Housel
District Field Director

Office of Congressman Robert Aderholt
1710 Alabama Avenue, Room 247
Jasper, AL 35501
Phone: 205-221-2310
Fax: 205-221-9035

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Armstrong, Kathy

From: Marraccini, Davina
Sent: Friday, April 20, 2018 1:57 PM
To: Simonson, Davy
Cc: O'Lone, Dan; Guzman, Humberto; Lincoln, Larry; Rodgers-Smith, Delores; Anderson, Meredith; Wise, Allison; Pinkney, James; McMillan, Laura; Garnett, Becky; Sampath, Sam; Davis, Molly; Wise, Allison
Subject: RE: Town of Parrish, AL

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 Public Affairs Specialist

U.S. EPA Region 4
404-562-8293 (office)
404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

*** Save trees! Please don't print this message unless necessary.

From: Simonson, Davy
Sent: Friday, April 20, 2018 10:28 AM
To: Marraccini, Davina <Marraccini.Davina@epa.gov>
Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>
Subject: RE: Town of Parrish, AL

Hi Davina.

I cut and pasted the Mayor's correspondence sent to Congressman Aderholt's field office, along with your straw response email to Paul Housel, into the attached Word document. My suggestions for your draft response email, as well as some pertinent notes, are in Track Changes.

-Davy

From: Marraccini, Davina
Sent: Thursday, April 19, 2018 1:05 PM
To: Simonson, Davy <Simonson.Davy@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>
Cc: Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>
Subject: FW: Town of Parrish, AL

All,

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DRAFT EMAIL RESPONSE:

Paul,

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moved?] The letter also notes that, in response to concerns from the public and ADEM, Big Sky will no longer accept biosolids originating from New York and New Jersey for disposal or land application at their Adamsville facility.

EPA was contacted by Mayor Hall in mid-March, prior to learning about Big Sky's aforementioned decisions. Staff in the Resource Conservation and Recovery Program explained EPA and ADEM's limited role. [Add language expressing what our role is from both the RCRA and water sides. Are there existing federal and/or state rules regarding where and how much of this material can be off loaded? Can we confirm this is a "non-hazardous" material and that EPA has little to no concerns? If not, what is our message? Are we aware of any notification requirements at the federal/state/local levels when the biosolids are transported into a municipality? Was EPA the source of the statement referenced by the Mayor that "we cannot measure odor"? If so can we expand upon that?]

In her email, Mayor Hall notes Big Sky Environmental is hoping to bring more material into Parrish location as a disbursement center. [Can we contact ADEM to confirm this? If true, does EPA and/or ADEM have any role?]

Lastly, the health-related concerns Mayor Hall cites, including breathing issues, would be more appropriately addressed by XX.

EPA will continue to monitor this situation and provide input when appropriate. If you have questions or need additional information from the EPA, please do not hesitate to contact me directly.

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marraccini.davina@epa.gov

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Begin forwarded message:

From: "Skane, Elizabeth" <Skane.Elizabeth@epa.gov>
Date: April 16, 2018 at 4:06:42 PM EDT
To: "Marraccini, Davina" <Marraccini.Davina@epa.gov>
Cc: "Levine, Carolyn" <Levine.Carolyn@epa.gov>
Subject: FW: Town of Parrish, AL

Hi Davina, we got the inquiry below from Cong. Aderholt's Jasper, AL District Field Director. Would you be so kind as to follow up directly with the staffer at your earliest convenience? Many thanks!

Cc Carolyn for OLEM awareness

Best,
Elizabeth

Elizabeth Skane ♦ 202.564.5696
US Environmental Protection Agency
Office of Congressional Affairs
WJC North 3443S

From: Eades, Cassaundra **On Behalf Of** OCIRmail

Sent: Monday, April 16, 2018 2:58 PM

To: Skane, Elizabeth <Skane.Elizabeth@epa.gov>; Borum, Denis <Borum.Denis@epa.gov>; Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>

Subject: FW: Town of Parrish, AL

From: Housel, Paul [<mailto:Paul.Housel@mail.house.gov>]

Sent: Thursday, March 01, 2018 12:05 PM

To: OCIRmail <OCIRmail@epa.gov>

Subject: Town of Parrish, AL

We received the following email from the Mayor of Parrish. Any direction or assistance you can provide will be greatly appreciated.

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The Town of Parrish has been thrust into an unfair and uninvited situation. We have large corporations shipping this waste material into municipalities and very little can be done to fight it. Most rural towns like Parrish do not have zoning laws and regulations (something I am hoping to fix). Incredibly, this material can be shipped into a municipality and not a word needs to be said to any municipal official. These are things that need to change.

Smaller towns do not have the funds to fight these legal battles, and I believe that is one reason this happens. I hope that someone in Washington DC is listening and can truly

understand the situation that I am facing. My question is this....is not the quality of life for the Town of Parrish just as important as Birmingham? Tuscaloosa? This material should not be allowed to enter any municipal district! The size of the town should not matter. And their ability to pay an attorney to fight the situation should not be the determining factor as to whether this type of material should be allowed to stay inside a town's boundaries!

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Thank you for your time,
Heather Hall
Mayor
Town of Parrish

Paul Housel
District Field Director
Office of Congressman Robert Aderholt
1710 Alabama Avenue, Room 247
Jasper, AL 35501
Phone: 205-221-2310
Fax: 205-221-9035

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Armstrong, Kathy

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Cc: O'Lone, Dan; Guzman, Humberto; Lincoln, Larry; Rodgers-Smith, Delores; Anderson, Meredith; Wise, Allison; Pinkney, James; McMillan, Laura; Simonson, Davy
Subject: RE: Town of Parrish, AL
Attachments: AL - Congress-Aderholt-BSE Biosolids on Trains-Response to Parrish Mayor.docx

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Elizabeth Skane ♦ 202.564.5696
US Environmental Protection Agency
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WJC North 34435

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Town of Parrish

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Office of Congressman Robert Aderholt
1710 Alabama Avenue, Room 247
Jasper, AL 35501
Phone: 205-221-2310
Fax: 205-221-9035

MAYOR'S CONCERNS/AS CONVEYED TO CONGRESSMAN'S OFFICE (DS HIGHLIGHTED ITEMS)

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Heather Hall
Mayor
Town of Parrish

Paul Housel
District Field Director
Office of Congressman Robert Aderholt

* * * * *

DAVINA'S DRAFT EMAIL RESPONSE (W/ DAVY'S SUGGESTIONS IN TRACK CHANGES):

Paul,

Thank you for forwarding the email from Mayor Hall expressing concerns about railcars loaded with truck trailers containing biosolids that hadve been stranded at a rail yard in the Town of Parrish.

As the Mayor notes, and per the attached letter written on behalf of the Big Sky Environmental, LLC -(Big Sky) landfill to the Alabama Department of Environmental Management (ADEM), EPA understands that the biosolids contained in the trailers on the railcars are in the process of being offloaded and delivered to the Big Sky facility. According to the letter, the transfer is expected to be completed by May 28, 2018. [Can we confirm with ADEM what the status is and add a sentence to reflect how many rail cars have been moved?]. The letter also notes that, in response to concerns from the public and ADEM, Big Sky will no longer accept biosolids originating from New York and New Jersey for disposal or land application at their Adamsville facility once the current offloading of trailers from the railcars is completed.

Commented [SD1]: I have sent ADEM SW managers an email (6:45 am Central) asking if they know the answer to this. I doubt that they are monitoring this, but will let you know once I hear back.

Commented [SD2R1]:

EPA was contacted by Mayor Hall in mid-March, prior to learning about Big Sky's aforementioned decisions details of the biosolids being "stockpiled" at the rail yard in Parrish. Staff in the Resource Conservation and Restoration Recovery Program Division (RCRD) explained EPA's and ADEM's limited role (per Congress' intent) in the management of nonhazardous solid waste (i.e., "nonhazardous" as defined under the Resource Conservation and Recovery Act, RCRA); explained that railroad transfer stations and rail yards are typically not State-regulated solid waste facilities (reconfirmed later by ADEM); and, suggested that the best entity to address potential health concerns would be the Alabama Department of Public Health (ADPH). [Add language expressing what our role is from both the RCRA and water sides. Are there existing federal and/or state rules regarding where and how much of this material can be off loaded? Can we confirm this is a "non-hazardous" material and that EPA has little to no concerns? If not, what is our message? Are we aware of any notification requirements at the federal/state/local levels when the biosolids are transported into a municipality? Was EPA the source of the statement referenced by the Mayor that "we cannot measure odor"? If so can we expand upon that?] RCRD staff shared the Mayor's concerns with ADEM solid waste management program personnel. ADEM confirmed they were aware of the situation and the Mayor's concerns, and confirmed that ADPH was aware, too.

Also of note, the federal biosolids regulations do not address "storage", only the disposal through surface application, incineration or landfilling. Moreover, it is EPA's understanding that ADEM's water program, prior to mid-March, had responded and inspected the trailers and railcars in Parrish and found no leakage.

In her email, Mayor Hall notes Big Sky Environmental is hoping to bring more material into Parrish location as a disbursement center. [Can we contact ADEM to confirm this? If true, does EPA and/or ADEM have any role?]

Lastly, the health-related concerns Mayor Hall cites, including breathing issues, would be more appropriately addressed by XX.

EPA will continue to monitor this situation and provide input when appropriate. If you have questions or need additional information from the EPA, please do not hesitate to contact me directly.

Commented [SD3]: This does not need to be in the response, but to be clear: We had heard some concerns about biosolids and the landfill from citizen complaints (to WPD and RCRD) and from ADEM regarding biosolids issues at the landfill during the State's determination of whether to renew the landfill's permit. What we DID NOT know prior to the conversation with the Mayor was that a lawsuit by another town had caused delivery of the biosolids to the landfill to be halted, thus resulting in the 'stockpiling' of the biosolids at the rail yard in Parrish.

Commented [SD4]: See next paragraph. I included language from Dan's 4/9/18 email, along with a comment about ADEM's inspection. Water-related statements are for Dan or Humberto to edit.

Commented [SD5]: Not to my knowledge. I don't think we want to go there in this response, but as an FYI and in regard to the Mayor's comments about shipping of these types of wastes into and/or through communities, courts have upheld the interstate transport of nonhazardous solid waste, primarily citing the Commerce Clause of the U.S. Constitution, I do believe.

Commented [SD6]: I've provided a reference to what we mean by 'nonhazardous', i.e., "per definition under RCRA".

Commented [SD7]: No.

Commented [SD8]: To my knowledge, EPA never made this comment. Generally speaking, and as the Mayor has correctly stated, odors are typically considered a nuisance. States normally include permit condition(s) in solid waste facility permits that address nuisances (e.g., odors, vectors, noise), and will get facilities to improve conditions that are causing such nuisances. However, these nuisances are not typically quantified/quantifiable. In this case, this is not a regulated solid waste management facility. As to the question of measuring odor, you may wish to speak with APTMD. David McNeal may be a place to start, as he deals with emissions from landfills under the CAA and NSPS. Odors may be outside his wheelhouse, but he or his managers should know who could best provide a statement that could possibly be used in this response email, if necessary.

Commented [SD9]: Dan's language from 4/9/18.

Formatted: Tab stops: 0.64", Left

Commented [SD10]: This has been addressed above in the discussion about the letter. EPA has no role. See comment above about

Commented [SD11]: This could be written as a reiteration of what is summarized above as part of the March conversation with the Mayor.

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Armstrong, Kathy

From: Guzman, Humberto
Sent: Friday, April 20, 2018 9:33 AM
To: Marraccini, Davina
Cc: O'Lone, Dan
Subject: RE: Town of Parrish, AL

Davina,

How are you today? I checked our ECHO database for this landfill and I found that this is a Minor facility with a General NPDES permit (ALG160168). The landfill, also called the Green Mountain Flat Top, submits a monthly Discharge Monitoring Report to ADEM, and it has not had any CWA violations since the permit was issued on January 30, 2017.

Humberto

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Sent: Thursday, April 19, 2018 1:05 PM
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EPA was contacted by Mayor Hall in mid-March, prior to learning about Big Sky's aforementioned decisions. Staff in the Resource Conservation and Recovery Program explained EPA and ADEM's limited role. [Add language expressing what our role is from both the RCRA and water sides. Are there existing federal and/or state rules regarding where and how much of this material can be off loaded? Can we confirm this is a "non-hazardous" material and that EPA has little to no concerns? If not, what is our message? Are we aware of any notification requirements at the federal/state/local levels

when the biosolids are transported into a municipality? Was EPA the source of the statement referenced by the Mayor that "we cannot measure odor"? If so can we expand upon that?]

In her email, Mayor Hall notes Big Sky Environmental is hoping to bring more material into Parrish location as a disbursement center. [Can we contact ADEM to confirm this? If true, does EPA and/or ADEM have any role?]

Lastly, the health-related concerns Mayor Hall cites, including breathing issues, would be more appropriately addressed by XX.

EPA will continue to monitor this situation and provide input when appropriate. If you have questions or need additional information from the EPA, please do not hesitate to contact me directly.

Davina Marraccini
Public Affairs Specialist
U.S. EPA Region 4
404-562-8293 (office)
404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

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Begin forwarded message:

From: "Skane, Elizabeth" <Skane.Elizabeth@epa.gov>
Date: April 16, 2018 at 4:06:42 PM EDT
To: "Marraccini, Davina" <Marraccini.Davina@epa.gov>
Cc: "Levine, Carolyn" <Levine.Carolyn@epa.gov>
Subject: FW: Town of Parrish, AL

Hi Davina, we got the inquiry below from Cong. Aderholt's Jasper, AL District Field Director. Would you be so kind as to follow up directly with the staffer at your earliest convenience? Many thanks!

Cc Carolyn for OLEM awareness

Best,
Elizabeth

Elizabeth Skane ♦ 202.564.5696
US Environmental Protection Agency
Office of Congressional Affairs
WJC North 3443S

From: Eades, Cassaundra On Behalf Of OCIRmail
Sent: Monday, April 16, 2018 2:58 PM
To: Skane, Elizabeth <Skane.Elizabeth@epa.gov>; Borum, Denis <Borum.Denis@epa.gov>; Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>
Subject: FW: Town of Parrish, AL

From: Housel, Paul [<mailto:Paul.Housel@mail.house.gov>]

Sent: Thursday, March 01, 2018 12:05 PM

To: OCIRmail <OCIRmail@epa.gov>

Subject: Town of Parrish, AL

We received the following email from the Mayor of Parrish. Any direction or assistance you can provide will be greatly appreciated.

I would like to try to explain the situation we are facing here in Parrish. Unbeknownst to anyone in the Town of Parrish, including the mayor's office, containers of Bio-solids (also known as sewer sludge) started arriving at the Norfolk Southern rail yard sometime at the end of January. Currently there are 42 train cars, each has 6 containers, each container holds 20 tons of material (or 40,000 pounds) of material. So there is approximately 10,080,000 pounds of human waste, bio-solids, or sewage sludge here in Parrish. Yes you read that correctly 10 million pounds.

My understanding is this is a non-hazardous material. And the EPA and ADEM have little to no concerns about this material. So even though there is such a large amount they are not offering any help to the Town of Parrish. I understand that this material may not be harmful to the environment. But what about the quality of life of the people of Parrish? The odor/stench off of this material is horrendous. I am not for hyperbole, so please understand that I am not exaggerating when I tell you at times it smells as if there are rotting carcasses all over the town of Parrish. This is not an everyday occurrence....but it has happened 3 days in the last week. This stench is also not just a "whiff" or light smell. The stench is overpowering and nauseating. It is causing the residents of Parrish to barricade inside. They can not go outside to sit on their porch, or work in their yards. The fumes permeate the entire town!

Next door to the Rail yard is where Parrish Park and Rec play baseball and softball. Children are being subjected to this stench! Our Spring Festival will be held at the old Parrish High School and it is adjacent to the Rail Road. The Ultimate Fair will be here in July. Can you imagine the problem if the temperatures are in the 90's? It will be a nightmare for the people of Parrish.

The Town of Parrish has been thrust into an unfair and uninvited situation. We have large corporations shipping this waste material into municipalities and very little can be done to fight it. Most rural towns like Parrish do not have zoning laws and regulations (something I am hoping to fix). Incredibly, this material can be shipped into a municipality and not a word needs to be said to any municipal official. These are things that need to change.

Smaller towns do not have the funds to fight these legal battles, and I believe that is one reason this happens. I hope that someone in Washington DC is listening and can truly understand the situation that I am facing. My question is this....is not the quality of life for the Town of Parrish just as important as Birmingham? Tuscaloosa? This material should not be allowed to enter any municipal district! The size of the town should not matter. And their ability to pay an attorney to fight the situation should not be the determining factor as to whether this type of material should be allowed to stay inside a town's boundaries!

You would think that this is common sense. However, I have had little to no help from ADEM, Health officials, or the EPA. We have people in Parrish who are having difficulty breathing due to the noxious fumes this material is putting off and I can get no help from these offices. I was told that "we can't measure odor". A person with respiratory issues can have a problem with their breathing when there are noxious fumes or even perfume in the air! I have several people complaining of breathing issues, but still we are receiving no help from the agencies that are supposed to be protecting the citizens.

I am hoping that the situation here in Parrish will shed light on this problem. I would like to see new guidelines in regards to where and how much of this material can be off loaded. It should never be allowed to be off loaded in a populated area. It is a health hazard and an incredible nuisance. I just can not stress to you enough how detrimentally this has affected the quality of life for the residents of Parrish.

As an update....the containers have finally been given approval to be transferred to Adamsville. However, Big Sky Environmental is hoping to bring more material into Parrish and use our location as a dispersment center. We will be fighting that.

Thank you for your time,
Heather Hall
Mayor
Town of Parrish

Paul Housel
District Field Director
Office of Congressman Robert Aderholt
1710 Alabama Avenue, Room 247
Jasper, AL 35501
Phone: 205-221-2310
Fax: 205-221-9035

BLANK PAGE

Armstrong, Kathy

From: Marraccini, Davina
Sent: Monday, April 23, 2018 1:44 PM
To: Garnett, Becky; Sampath, Sam
Cc: Simonson, Davy; O'Lone, Dan; Guzman, Humberto; Lincoln, Larry; Rodgers-Smith, Delores; Anderson, Meredith; Wise, Allison; Pinkney, James; McMillan, Laura; Davis, Molly
Subject: RE: Town of Parrish, AL
Attachments: Big Sky letter to ADEM 3_29_2018.pdf

Thanks again to everyone for your input on the response to Cong. Aldehort's office. Below is a copy of the final response I sent today:

Paul,

Your email was forwarded to my office in EPA Region 4 for response. We appreciate you forwarding the email from Mayor Hall expressing concerns about containers of biosolids on railcars that had been stranded at a rail yard in the Town of Parrish.

EPA understands that the last of the containers of biosolids were offloaded from the railcars and delivered to the Big Sky Environmental, LLC (Big Sky) landfill last week. As the Mayor notes, and per the attached letter on behalf of the Big Sky landfill to the Alabama Department of Environmental Management (ADEM), Big Sky will no longer accept biosolids originating from New York and New Jersey for disposal at their Adamsville landfill in response to concerns from the public and ADEM.

EPA was contacted by Mayor Hall in mid-March. Staff in the Resource Conservation and Restoration Division explained EPA's limited role in managing nonhazardous solid waste; explained that railroad transfer stations and rail yards are typically not state-regulated solid waste facilities; and suggested that the best entity to address potential health concerns would be the Alabama Department of Public Health (ADPH).

EPA shared the Mayor's concerns with ADEM's solid waste management program. ADEM confirmed they were aware of the situation and the Mayor's concerns, and confirmed that ADPH was aware too. EPA understands that in response to concerns, ADEM's water program responded and inspected the railcars in Parrish and found no leakage from the containers of biosolids.

With regard to other concerns raised in the Mayor's email, the Clean Water Act does require the written notice to the state permitting authority when biosolids are proposed to be landfilled in a different state from where it originated. There is no federal notification requirement for municipalities. Federal regulations do not limit the volume of biosolids that may be landfilled.

With respect to odors, these are generally considered a nuisance that are not typically quantified/quantifiable. Since railroad transfer stations and rail yards are not state-regulated solid waste management facilities, there is no permit with provisions that would address control of nuisance odors.

EPA will continue to monitor this situation and provide input when appropriate. If you have questions or need additional information from the EPA, please do not hesitate to contact me directly.

Davina Marraccini
 Public Affairs Specialist

U.S. EPA Region 4
404-562-8293 (office)
404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

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From: Garnett, Becky
Sent: Monday, April 23, 2018 9:15 AM
To: Marraccini, Davina <Marraccini.Davina@epa.gov>; Sampath, Sam <Sampath.Sam@epa.gov>
Cc: Simonson, Davy <Simonson.Davy@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Davis, Molly <Davis.Molly@epa.gov>
Subject: RE: Town of Parrish, AL

The letter looks good to me with Sam and Davy's distinctions. Thanks, all!

Becky
2-8083

From: Marraccini, Davina
Sent: Monday, April 23, 2018 9:11 AM
To: Sampath, Sam <Sampath.Sam@epa.gov>
Cc: Simonson, Davy <Simonson.Davy@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Garnett, Becky <Garnett.Becky@epa.gov>; Davis, Molly <Davis.Molly@epa.gov>
Subject: Re: Town of Parrish, AL

Yes, I will incorporate your suggestion in the final Sam.

Sent from my iPhone

On Apr 23, 2018, at 9:09 AM, Sampath, Sam <Sampath.Sam@epa.gov> wrote:

Davy/Davina,

I suggested to Davina last Friday to swap the yellow color highlighted words below to **landfilled**. This whole issue is related to landfill not land application that involves class A biosolids and the rest of the sentences still hold good meeting 503Regs.

Hope you agree with me.

Thanks
Sam
678-770-6180c

From: Simonson, Davy

Sent: Monday, April 23, 2018 8:55 AM

To: Marraccini, Davina <Marraccini.Davina@epa.gov>

Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Garnett, Becky <Garnett.Becky@epa.gov>; Sampath, Sam <Sampath.Sam@epa.gov>; Davis, Molly <Davis.Molly@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>

Subject: RE: Town of Parrish, AL

Importance: High

Hi Davina. Here are my recommendations. Additions are in red below. Some deletions have been made, also (and may not be indicated as would be the case using track changes). Please note I did not use the revised version that water sent to you, so their edits are not included below.

1st, 2nd, & 4th paragraphs: I suggest removing: "railcars containing biosolids" and, "biosolids contained in the railcars". These terms indicate EPA thinks that the biosolids were in boxcars or in covered open-top railcars, rather than in containers (ready for offloading and transport to the MSWLF) **sitting atop** flatbed-type railcars. I've added short, yet more-accurate language to the response.

3rd paragraph: I have removed: "including biosolids, as defined under the Resource Conservation and Recovery Act". This is not necessarily accurate. As we discussed Friday, biosolids are regulated under part 503 of the CWA. In my initial edits, I attempted to define the word "nonhazardous" from a RCRA point of view (i.e., making sure to differentiate it from RCRA subtitle C hazardous waste). The Mayor's correspondence repeatedly refers to biosolids as a "material". Upon disposal, the biosolids are a waste (and no longer a "material" that can be land applied, composted, etc.). In the context of a MSWLF accepting biosolids, some states may refer to it as a "special waste". But, nonetheless, it is a waste and not a material upon disposal. Bottom line, I believe that "nonhazardous solid waste" as written below should suffice. That is what I explained to the Mayor during our phone call (i.e., from a RCRA viewpoint). I did not attempt to speak on biosolids in great detail during our conversation.

6th paragraph (odors as a nuisance): I edited this paragraph significantly. Please call me if you wish to discuss. Thanks.

Davy (202-510-0392)

From: Marraccini, Davina

Sent: Friday, April 20, 2018 1:57 PM

To: Simonson, Davy <Simonson.Davy@epa.gov>

Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Garnett, Becky <Garnett.Becky@epa.gov>; Sampath, Sam <Sampath.Sam@epa.gov>; Davis, Molly <Davis.Molly@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>

Subject: RE: Town of Parrish, AL

Thanks to everyone who has provided input thus far. Please see the updated/edited version of the email below, and let me know of any needed changes for accuracy ASAP. I realize it's late in the day on a Friday, but would love to get back to the Cong. today if at all possible.

Paul,

Thank you for forwarding the email from Mayor Hall expressing concerns about contained biosolids on railcars that had been stranded at a rail yard in the Town of Parrish.

As the Mayor notes, and per the attached letter on behalf of the Big Sky Environmental, LLC (Big Sky) landfill to the Alabama Department of Environmental Management (ADEM), EPA understands that the last of the containers of biosolids were offloaded from the railcars and delivered to the Big Sky facility earlier this week [Note: this would now be "last week"]. The letter also notes that, in response to concerns from the public and ADEM, Big Sky will no longer accept biosolids originating from New York and New Jersey for disposal or land application at their Adamsville landfill facility.

EPA was contacted by Mayor Hall in mid-March. Staff in the Resource Conservation and Restoration Division explained EPA's limited role in managing nonhazardous solid waste; explained that railroad transfer stations and rail yards are typically not state-regulated solid waste facilities; and suggested that the best entity to address potential health concerns would be the Alabama Department of Public Health (ADPH).

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EPA will continue to monitor this situation and provide input when appropriate. If you have questions or need additional information from the EPA, please do not hesitate to contact me directly.

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404-562-8293 (office)
404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

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From: Simonson, Davy
Sent: Friday, April 20, 2018 10:28 AM

To: Marraccini, Davina <Marraccini.Davina@epa.gov>

Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>

Subject: RE: Town of Parrish, AL

Hi Davina.

I cut and pasted the Mayor's correspondence sent to Congressman Aderholt's field office, along with your straw response email to Paul Housel, into the attached Word document. My suggestions for your draft response email, as well as some pertinent notes, are in Track Changes.

-Davy

From: Marraccini, Davina

Sent: Thursday, April 19, 2018 1:05 PM

To: Simonson, Davy <Simonson.Davy@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>

Cc: Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>

Subject: FW: Town of Parrish, AL

All,

Please see the straw response to the Congressman's representative about the Mayor's email. I highlighted areas where I need input from either WPD or RCRA. Please send your suggestions NLT 10 am tomorrow, if possible.

DRAFT EMAIL RESPONSE:

Paul,

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biosolids are transported into a municipality? Was EPA the source of the statement referenced by the Mayor that "we cannot measure odor"? If so can we expand upon that?]

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Davina Marraccini
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404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

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Date: April 16, 2018 at 4:06:42 PM EDT
To: "Marraccini, Davina" <Marraccini.Davina@epa.gov>
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Subject: FW: Town of Parrish, AL

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Cc Carolyn for OLEM awareness

Best,
Elizabeth

Elizabeth Skane ♦ 202.564.5696
US Environmental Protection Agency
Office of Congressional Affairs
WJC North 34435

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Sent: Monday, April 16, 2018 2:58 PM
To: Skane, Elizabeth <Skane.Elizabeth@epa.gov>; Borum, Denis <Borum.Denis@epa.gov>; Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>
Subject: FW: Town of Parrish, AL

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am facing. My question is this....is not the quality of life for the Town of Parrish just as important as Birmingham? Tuscaloosa? This material should not be allowed to enter any municipal district! The size of the town should not matter. And their ability to pay an attorney to fight the situation should not be the determining factor as to whether this type of material should be allowed to stay inside a town's boundaries!

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As an update....the containers have finally been given approval to be transferred to Adamsville. However, Big Sky Environmental is hoping to bring more material into Parrish and use our location as a dispersment center. We will be fighting that.

Thank you for your time,
Heather Hall
Mayor
Town of Parrish

Paul Housel
District Field Director
Office of Congressman Robert Aderholt
1710 Alabama Avenue, Room 247
Jasper, AL 35501
Phone: 205-221-2310
Fax: 205-221-9035



March 29, 2018

Alabama Department of
Environmental Management
Post Office Box 301463
Montgomery, Alabama 36130-1463

VIA UNITED PARCEL SERVICE

Attention: Mr. Eric Sanderson, Chief
Solid Waste Branch

RE: Response to Request for Additional Information
Renewal of Solid Waste Disposal Permit 37-48
Big Sky Environmental, LLC, Solid Waste Facility
Adamsville, Jefferson County, Alabama

Dear Mr. Sanderson:

On behalf of Big Sky Environmental, LLC (Big Sky), Highland Technical Services, Inc. (HTSI) is submitting this response to the request for additional information dated March 15, 2018, submitted by the Alabama Department of Environmental Management (ADEM) to Big Sky, to assist in renewal of the facility's Solid Waste Disposal Permit Number 37-48. The ADEM requests are shown below in italics with the Big Sky responses immediately following each request.

REQUEST: *Due to recent mining activities conducted at the site, the Department has requested that the facility's stormwater management plan be updated to include the design and narrative of the landfill's run-off control system in accordance with ADEM Admin. Code r. 335-13-4-.17(2) and (3). This includes volume calculations for a 24-hour, 25-year storm event. Additionally, an updated facility map which includes at a minimum: the permitted disposal area, biosolids handling area, biosolids land application and disposal area(s), stormwater flow directions, and control structures for a 24-hour, 25-year storm event is requested.*

RESPONSE: Neither the stormwater management system design nor the means of achieving compliance with the requirements of ADEM Admin. Code r. 335-13-4-.17(2) or (3) has changed due to the referenced mining activities. The pending permit renewal application proposes to adhere to the same stormwater management plan and design, as prepared by CDG Engineers and submitted by Construction Management Services, LLC in April 2005 and revised in September 2006. This plan and design were previously approved by the Department for the permit renewal on September 21, 2012, and for the initial permit issuance approved on August 6, 2007. Despite the presence of mining activities, as stated in the pending permit renewal application, the landfill operations would remain in Phase I of the overall design, i.e. a combined disposal area of 161.24 acres (66.24 acres MSW and 95 acres C/D) out of the total facility size of 1,522.7 acres. As such, the stormwater retention basin system designed by CDG Engineers would be sufficient to meet the required 24-hour, 25-year storm event, as reflected in Section 5.6 and Appendix 5.1 of the September 2006 permit application. Moreover, it should be noted that, as designed, the stormwater basins each include an additional two feet so as to ensure sufficient capacity for larger volumes than those resulting from the 24-hour, 25-year storm event.

However, based on previous discussions with the Department, Big Sky Environmental, LLC has filed an electronic Notice of Intent (eNOI) to re-locate the permitted outfall under their general NPDES permit, so as to sample landfill related stormwater discharge prior to its confluence with runoff from the mining operations. This request is currently pending with the ADEM Water Division.

REQUEST: *The Department has requested that a comprehensive nutrient management plan be submitted which includes details as to how the biosolids are managed at the facility in accordance with EPA's Part 503B Biosolids Program. The Department has also requested a detailed description of the biosolids handling process from receipt of the biosolids to landfill disposal and/or land application.*

RESPONSE: Due to concerns expressed by the public and the ADEM, Big Sky will no longer accept biosolids, originating in the States of New York and New Jersey, for disposal and/or land application at the Big Sky Adamsville facility. As such, Big Sky is of the opinion that a nutrient management plan will no longer be required.

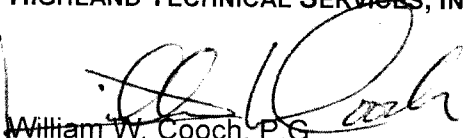
As you are aware, the biosolids are delivered to the local area by rail and loaded to trucks for delivery to the Big Sky facility. It is our understanding that approximately 44 rail cars remain at one or more rail spurs in Jefferson and Walker Counties. Once the contents of the remaining rail cars are delivered to the Big Sky facility, no additional biosolids will be delivered via rail to the Big Sky Adamsville facility. The remaining biosolids will be disposed of in the active lined cell of the landfill under the following ADEM Waste Profile numbers:

| | |
|--------|--------|
| 160917 | 162134 |
| 161604 | 161538 |
| 161539 | 161534 |
| 162046 | 161530 |
| 162086 | 162135 |
| 161532 | |

Big Sky anticipates that the transportation and disposal of the remaining biosolids will require approximately 60 days to complete. Within 10 days following disposal of the final load of waste, Big Sky will notify the ADEM to terminate the waste approvals associated with the above-referenced Waste Profiles.

Highland Technical Services, Inc. and Big Sky Environmental, LLC hope that this response will assist the ADEM with the renewal of the facility's Solid Waste Disposal Permit. If you have any questions concerning this submittal or require any additional information, please contact our office at (205) 985-4874.

Sincerely,
HIGHLAND TECHNICAL SERVICES, INC.


William W. Cooch, P.G.
Principal Geologist

cc: Johnathon Click, VP of Operations

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Armstrong, Kathy

From: Guzman, Humberto
Sent: Thursday, February 22, 2018 3:01 PM
To: Davis, Molly
Subject: RE: Big Sky Environmental Landfill - AI

It may have a stormwater permit. The complainant states that it may have "the potential for devastating consequences". To me it read like the complainant does not want the landfill to expand any more.

-----Original Message-----

From: Davis, Molly
Sent: Thursday, February 22, 2018 2:57 PM
To: Guzman, Humberto <Guzman.Humberto@epa.gov>
Subject: RE: Big Sky Environmental Landfill - AI

So the landfill must not have a NPDES permit.

-----Original Message-----

From: Guzman, Humberto
Sent: Thursday, February 22, 2018 2:44 PM
To: Davis, Molly <Davis.Molly@epa.gov>
Cc: O'Lone, Dan <Olone.Dan@epa.gov>
Subject: RE: Big Sky Environmental Landfill - AI

This appears to be an extension of a permit for a landfill. I don't believe that we can do anything about this. I'll ask RCRA if they know about this landfill.

-----Original Message-----

From: Davis, Molly
Sent: Thursday, February 22, 2018 2:37 PM
To: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>
Subject: FW: Big Sky Environmental Landfill - AI

Dan and Humberto,

I'm not sure if this is an enforcement matter we would handle or is it something we might send to CID? Please advise! Molly

-----Original Message-----

From: Ellington, Natalie
Sent: Thursday, February 22, 2018 2:34 PM
To: Davis, Molly <Davis.Molly@epa.gov>
Cc: Thomas, Chris <Thomas.Chris@epa.gov>
Subject: FW: Big Sky Environmental Landfill - AI

Molly,

As the Water Enforcement Branch Chief, this seems a request for your (and/or your staff's) involvement.

Natalie

-----Original Message-----

From: David Eastis, [mailto:davideastis@gmail.com]
Sent: Wednesday, February 14, 2018 11:53 AM
To: Ellington, Natalie <Ellington.Natalie@epa.gov>
Cc: David Eastis [mailto:davideastis@gmail.com]
Subject: Big Sky Environmental Landfill - Al

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Despite the united protests (stench, flies, feral pigs, spills) from residents near and around the landfill, Black Warrior River Keeper's (BWRK) contradiction of BSE's statements of compliance and monitoring, and BWRK's statements of ADEM not holding BSE compliant and enforcing reported lack of monitoring water runoff, spills, and NOVs, it appears ADEM is going ahead with their approval of extending their permit. This has the potential of devastating consequences for the Warrior River, a water source for Birmingham, Jefferson county, Walker county and surrounding areas.

Would you please call me at your earliest convenience.

Many thanks,

David Eastis
205-919-0711
davideastis@gmail.com

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Many thanks,

David Eastis
205-919-0711
davideastis@gmail.com

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Armstrong, Kathy

From: Guzman, Humberto
Sent: Tuesday, March 20, 2018 8:52 AM
To: O'Lone, Dan
Subject: RE: Big Sky Environmental Landfill - AI

Davy told me that he would talk to the complainant, Mr. Eastis. He was going to leave it to ADEM to take care of any issues.

From: O'Lone, Dan
Sent: Tuesday, March 20, 2018 7:26 AM
To: Guzman, Humberto <Guzman.Humberto@epa.gov>
Subject: Fwd: Big Sky Environmental Landfill - AI

I was looking for something else, but came across this. I thought I'd forward it since we were talking about the situation there.

Dan

Dan O'Lone, Acting Chief
 NPEB permitting and
 Enforcement Branch

Sent from my iPhone

Begin forwarded message:

From: "Guzman, Humberto" <Guzman.Humberto@epa.gov>
Date: February 28, 2018 at 13:26:49 EST
To: "O'Lone, Dan" <Olone.Dan@epa.gov>
Subject: FW: Big Sky Environmental Landfill - AI

-----Original Message-----

From: Zapata, Cesar
Sent: Tuesday, February 27, 2018 3:43 PM
To: Guzman, Humberto <Guzman.Humberto@epa.gov>
Subject: RE: Big Sky Environmental Landfill - AI

Thank you Humberto.

César A. Zapata
 Deputy Director
 Water Protection Division
 United States Environmental Protection Agency, Region 4

-----Original Message-----

From: Guzman, Humberto

Sent: Tuesday, February 27, 2018 3:41 PM
To: Zapata, Cesar <Zapata.Cesar@epa.gov>
Subject: RE: Big Sky Environmental Landfill - AI

Cesar,

I sent this complaint to Larry Lamberth and Davy Simonson last week. It's about an expansion of a landfill and potential effects to water. I think that it is for RCRA.

H

-----Original Message-----

From: Zapata, Cesar
Sent: Tuesday, February 27, 2018 3:37 PM
To: Guzman, Humberto <Guzman.Humberto@epa.gov>; Horsey, Maurice <Horsey.Maurice@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>
Subject: FW: Big Sky Environmental Landfill - AI

FYI

-----Original Message-----

From: Torres, Ramon
Sent: Tuesday, February 27, 2018 3:15 PM
To: Zapata, Cesar <Zapata.Cesar@epa.gov>
Subject: Re: Big Sky Environmental Landfill - AI

Thanks Cesar,

I am working on it and I will let you know soon.

Take care,

Sent from my iPhone

On Feb 27, 2018, at 2:58 PM, Zapata, Cesar <Zapata.Cesar@epa.gov> wrote:

Ramon,

FYI, not sure if this has made it to RCRD. If it has, please let me know who is dealing with it to coordinate a response.

César A. Zapata
Deputy Director
Water Protection Division
United States Environmental Protection Agency, Region 4

-----Original Message-----

From: Thomas, Chris

Sent: Monday, February 26, 2018 8:11 AM

To: Zapata, Cesar <Zapata.Cesar@epa.gov>; Horsey, Maurice <Horsey.Maurice@epa.gov>

Cc: Davis, Molly <Davis.Molly@epa.gov>; Ellington, Natalie <Ellington.Natalie@epa.gov>

Subject: FW: Big Sky Environmental Landfill - AI

Fyi

-----Original Message-----

From: Ellington, Natalie

Sent: Thursday, February 22, 2018 2:34 PM

To: Davis, Molly <Davis.Molly@epa.gov>

Cc: Thomas, Chris <Thomas.Chris@epa.gov>

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Molly,

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Would you please call me at your earliest convenience.

Many thanks,

David Eastis

205-919-0711

davideastis@gmail.com

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Armstrong, Kathy

From: Pinkney, James
Sent: Wednesday, April 18, 2018 9:23 AM
To: Simonson, Davy
Cc: Lincoln, Larry; Rodgers-Smith, Delores; Anderson, Meredith; Torres, Ramon; Monell, Carol; McMillan, Laura; Marraccini, Davina; Wise, Allison; Webster, James; O'Lone, Dan; Zapata, Cesar; Guzman, Humberto
Subject: RE: Media Inquiry - Alabama (Biosolids)

Davy,

I have left several messages with this reporter to contact the public affairs office for a response. To date, she has not returned any of my calls. I suggest preparing a statement on EPA's involvement in this matter. I will continue reaching out to the reporter and supply her with the statement once it has been reviewed and approved by HQ.

James

From: Simonson, Davy
Sent: Tuesday, April 17, 2018 8:36 AM
To: Pinkney, James <Pinkney.James@epa.gov>
Cc: Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Torres, Ramon <Torres.Ramon@epa.gov>; Monell, Carol <Monell.Carol@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Marraccini, Davina <Marraccini.Davina@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Webster, James <Webster.James@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>
Subject: RE: Media Inquiry - Alabama (Biosolids)

James,

Ms. Kipnis left me another VMM yesterday (4/16/18) at 10:51 a.m. She did not mention whether or not she had heard your message yet. She reiterated that she got my name and number from Eric Sanderson at ADEM, and has questions for me about a story she is working on (the biosolids being temporarily 'stored' at the railyard, per Eric's discussion with her). Her number is 718-233-3647. I looked up *Vice News Tonight* and it is a nightly HBO news show (<https://www.google.com/search?q=vice%20news%20tonight&cad=h>), fyi.

Davy

From: Pinkney, James
Sent: Thursday, April 12, 2018 3:22 PM
To: Lincoln, Larry <Lincoln.Larry@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>
Cc: Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Torres, Ramon <Torres.Ramon@epa.gov>; Monell, Carol <Monell.Carol@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Marraccini, Davina <Marraccini.Davina@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Webster, James <Webster.James@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>
Subject: RE: Media Inquiry - Alabama (Biosolids)

Davy,

I left a message with the reporter to contact me directly with her questions. Once she responds, I will coordinate a written response with you.

James

From: Lincoln, Larry

Sent: Thursday, April 12, 2018 2:46 PM

To: Simonson, Davy <Simonson.Davy@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>

Cc: Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Torres, Ramon <Torres.Ramon@epa.gov>; Monell, Carol <Monell.Carol@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Marraccini, Davina <Marraccini.Davina@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Webster, James <Webster.James@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>

Subject: RE: Media Inquiry - Alabama (Biosolids)

Looping in James Pinkney who handles Alabama.

Larry

Director

Office of External Affairs

U.S. Environmental Protection Agency, Region 4

Phone: (404) 562-8304

Email: lincoln.larry@epa.gov

<https://www.epa.gov/aboutepa/about-epa-region-4-southeast>

Follow Region 4 on Twitter: [www.twitter.com/EPASoutheast](https://twitter.com/EPASoutheast)

And Facebook: www.facebook.com/eparegion4

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To: Lincoln, Larry <Lincoln.Larry@epa.gov>

Cc: Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Torres, Ramon <Torres.Ramon@epa.gov>; Monell, Carol <Monell.Carol@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Marraccini, Davina <Marraccini.Davina@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Webster, James <Webster.James@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>

Subject: Media Inquiry - Alabama (Biosolids)

Importance: High

Larry,

While I was at lunch today, a reporter left me a VMM stating that she was calling in regard to a story she is working on and wanted to ask me some questions. No specific topic was provided in her message, which came in at 12:39 pm. I have not called her back. She obtained my phone number from ADEM's solid waste program manager, Eric Sanderson.

I just spoke with Eric, and he confirmed that the reporter is inquiring about the different agencies' roles in regard to the biosolids situation (i.e., the biosolids from NY/NJ contained in truck trailers on rail cars in Walker County).

The reporter's name is Valerie Kipnis (SP?) and she is with *Vice News Tonight*. Ms. Kipnis' phone number is 718-233-3647.

Davy
X28457

ps- Eric informed me that no more NY/NJ biosolids will be coming to the Big Sky Environmental MSWLF, once the ~30 remaining trailers are transferred/transported/off-loaded. **Email on that great news to follow.**

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Armstrong, Kathy

From: Lincoln, Larry
Sent: Wednesday, April 18, 2018 9:25 AM
To: Pinkney, James; Simonson, Davy
Cc: Rodgers-Smith, Delores; Anderson, Meredith; Torres, Ramon; Monell, Carol; McMillan, Laura; Marraccini, Davina; Wise, Allison; Webster, James; O'Lone, Dan; Zapata, Cesar; Guzman, Humberto
Subject: RE: Media Inquiry - Alabama (Biosolids)

Sending statement is the best way to go. If she has follow on questions she can contact us.

Larry

Director
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 U.S. Environmental Protection Agency, Region 4
 Phone: (404) 562-8304
 Email: lincoln.larry@epa.gov
<https://www.epa.gov/aboutepa/about-epa-region-4-southeast>
 Follow Region 4 on Twitter: www.twitter.com/EPASoutheast
 And Facebook: www.facebook.com/eparegion4

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Sent: Thursday, April 12, 2018 2:46 PM

To: Simonson, Davy <Simonson.Davy@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>

Cc: Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Torres, Ramon <Torres.Ramon@epa.gov>; Monell, Carol <Monell.Carol@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Marraccini, Davina <Marraccini.Davina@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Webster, James <Webster.James@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>

Subject: RE: Media Inquiry - Alabama (Biosolids)

Looping in James Pinkney who handles Alabama.

Larry

Director

Office of External Affairs
U.S. Environmental Protection Agency, Region 4
Phone: (404) 562-8304
Email: lincoln.larry@epa.gov
<https://www.epa.gov/aboutepa/about-epa-region-4-southeast>
Follow Region 4 on Twitter: [www.twitter.com/EPASoutheast](https://twitter.com/EPASoutheast)
And Facebook: www.facebook.com/eparegion4

From: Simonson, Davy
Sent: Thursday, April 12, 2018 2:45 PM
To: Lincoln, Larry <Lincoln.Larry@epa.gov>
Cc: Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Torres, Ramon <Torres.Ramon@epa.gov>; Monell, Carol <Monell.Carol@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Marraccini, Davina <Marraccini.Davina@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Webster, James <Webster.James@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>
Subject: Media Inquiry - Alabama (Biosolids)
Importance: High

Larry,

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I just spoke with Eric, and he confirmed that the reporter is inquiring about the different agencies' roles in regard to the biosolids situation (i.e., the biosolids from NY/NJ contained in truck trailers on rail cars in Walker County).

The reporter's name is Valerie Kipnis (SP?) and she is with *Vice News Tonight*. Ms. Kipnis' phone number is 718-233-3647.

Davy
X28457

ps- Eric informed me that no more NY/NJ biosolids will be coming to the Big Sky Environmental MSWLF, once the ~30 remaining trailers are transferred/transported/off-loaded. **Email on that great news to follow.**

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Armstrong, Kathy

From: Marraccini, Davina
Sent: Thursday, April 12, 2018 2:47 PM
To: Simonson, Davy
Cc: Lincoln, Larry; Rodgers-Smith, Delores; Anderson, Meredith; Torres, Ramon; Monell, Carol; McMillan, Laura; Wise, Allison; Webster, James; O'Lone, Dan; Zapata, Cesar; Guzman, Humberto; Pinkney, James
Subject: Re: Media Inquiry - Alabama (Biosolids)

Thank you, Davy. I'm adding James who covers press for AL.

-Davina

Sent from my iPhone

On Apr 12, 2018, at 2:45 PM, Simonson, Davy <Simonson.Davy@epa.gov> wrote:

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To: Simonson, Davy; Pinkney, James
Cc: Rodgers-Smith, Delores; Anderson, Meredith; Torres, Ramon; Monell, Carol; McMillan, Laura; Marraccini, Davina; Wise, Allison; Webster, James; O'Lone, Dan; Zapata, Cesar; Guzman, Humberto
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 And Facebook: www.facebook.com/eparegion4

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Subject: Media Inquiry - Alabama (Biosolids)
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Armstrong, Kathy

From: Simonson, Davy
Sent: Tuesday, April 17, 2018 8:36 AM
To: Pinkney, James
Cc: Lincoln, Larry; Rodgers-Smith, Delores; Anderson, Meredith; Torres, Ramon; Monell, Carol; McMillan, Laura; Marraccini, Davina; Wise, Allison; Webster, James; O'Lone, Dan; Zapata, Cesar; Guzman, Humberto
Subject: RE: Media Inquiry - Alabama (Biosolids)

James,

Ms. Kipnis left me another VMM yesterday (4/16/18) at 10:51 a.m. She did not mention whether or not she had heard your message yet. She reiterated that she got my name and number from Eric Sanderson at ADEM, and has questions for me about a story she is working on (the biosolids being temporarily 'stored' at the railyard, per Eric's discussion with her). Her number is 718-233-3647. I looked up *Vice News Tonight* and it is a nightly HBO news show (<https://www.google.com/search?q=vice%20news%20tonight&cad=h>), fyi.

Davy

From: Pinkney, James
Sent: Thursday, April 12, 2018 3:22 PM
To: Lincoln, Larry <Lincoln.Larry@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>
Cc: Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Torres, Ramon <Torres.Ramon@epa.gov>; Monell, Carol <Monell.Carol@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Marraccini, Davina <Marraccini.Davina@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Webster, James <Webster.James@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>
Subject: RE: Media Inquiry - Alabama (Biosolids)

Davy,

I left a message with the reporter to contact me directly with her questions. Once she responds, I will coordinate a written response with you.

James

From: Lincoln, Larry
Sent: Thursday, April 12, 2018 2:46 PM
To: Simonson, Davy <Simonson.Davy@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>
Cc: Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Torres, Ramon <Torres.Ramon@epa.gov>; Monell, Carol <Monell.Carol@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Marraccini, Davina <Marraccini.Davina@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Webster, James <Webster.James@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>
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X28457

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Armstrong, Kathy

From: Guzman, Humberto
Sent: Wednesday, February 28, 2018 1:26 PM
To: O'Lone, Dan
Subject: RE: Parrish Alabama environmental issue

Dan,

This is the landfill that is expanding. RCRA is working on the complaint. I'll send you an email to remind you. Cesar asked about it yesterday.

H

From: O'Lone, Dan
Sent: Wednesday, February 28, 2018 1:14 PM
To: Guzman, Humberto <Guzman.Humberto@epa.gov>
Cc: Mattox, Mary <Mattox.Mary@epa.gov>
Subject: Fwd: Parrish Alabama environmental issue

Humberto, can you please give a call to the state & get the rest of the story?
 Biosolids should not be that odiferous. We may need to call R2 and ask them to look into what NY & NJ are shipping out.
 We may contact R7.

Dan

Dan O'Lone, Chief
 Stormwater and
 Residuals Enforcement Section

Sent from my iPhone

Begin forwarded message:

From: "Horsey, Maurice" <Horsey.Maurice@epa.gov>
Date: February 28, 2018 at 07:48:10 EST
To: "Mattox, Mary" <Mattox.Mary@epa.gov>, "O'Lone, Dan" <Olone.Dan@epa.gov>
Subject: FW: Parrish Alabama environmental issue

Fyi

Maurice L. Horsey, IV

Maurice L. Horsey, IV | Chief
 Municipal & Industrial Enforcement Section
 NPDES & Permits Enforcement Branch
 Water Protection Division
 U.S. Environmental Protection Agency | Region IV
 Office: 404.562.9764 | Cell: 470.259.2555 | Fax: 404.562.9772

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From: Generette, Lloyd

Sent: Wednesday, February 28, 2018 7:44 AM

Subject: Parrish Alabama environmental issue

<http://abc3340.com/news/local/its-a-horrible-smell-parrish-town-council-to-meet-over-big-skys-biosolid-storage>

BLANK PAGE

Armstrong, Kathy

From: Guzman, Humberto
Sent: Wednesday, February 28, 2018 1:36 PM
To: O'Lone, Dan
Subject: RE: Parrish Alabama environmental issue

It seems like Alabama likes to take waste from other States. They also took coal ash from Tennessee, and they have the only hazardous waste landfill (Emile, AL) in the SE.

From: O'Lone, Dan
Sent: Wednesday, February 28, 2018 1:14 PM
To: Guzman, Humberto <Guzman.Humberto@epa.gov>
Cc: Mattox, Mary <Mattox.Mary@epa.gov>
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Fyi

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Sent: Thursday, April 12, 2018 2:45 PM
To: Lincoln, Larry
Cc: Rodgers-Smith, Delores; Anderson, Meredith; Torres, Ramon; Monell, Carol; McMillan, Laura; Marraccini, Davina; Wise, Allison; Webster, James; O'Lone, Dan; Zapata, Cesar; Guzman, Humberto; Simonson, Davy
Subject: Media Inquiry - Alabama (Biosolids)
Importance: High

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From: Simonson, Davy
Sent: Wednesday, April 18, 2018 11:30 PM
To: Pinkney, James; Marraccini, Davina
Cc: Lincoln, Larry; O'Lone, Dan; Guzman, Humberto; Rodgers-Smith, Delores; Anderson, Meredith; McMillan, Laura; Wise, Allison; Webster, James
Subject: RE: AL Biosolids Statement
Attachments: ADEM Response 3-29-2018 Rev2.pdf
Importance: High

James – It is not very wise for me/R4 to write a general statement on EPA's role regarding the events associated with the "NYC biosolids in truck trailers on railcars stored in a railyard in AL while in transit to the BSE MSWLF" issue, as you and Larry suggested/requested earlier today that I write. The reporter, as I have summarized in previous emails, has left me two voice mail messages. The second of those VMMs appears to have been after she very likely heard your VMMs to her that recommended she call you (rather than me). Her two messages to me have not even mentioned a topic. I know the topic (i.e., biosolids in AL) that she is interested in, only from speaking with ADEM's solid waste Chief, who gave my phone number to her to begin with. **Anything that I might summarize** about the conversations I've had over the past two months with ADEM, citizens, the Mayor, et.al., or other knowledge that I have of the situation **may or may not be pertinent to her possible specific questions**. Why would we consider writing something for media consumption without even knowing what the specific issues and/or questions are? Cans of worms are for fishin'.

As you know, I spoke with Davina earlier today and she explained that there is now an inquiry from a Congressman that, when responded to, the response should serve as a template for any **general** response to media inquiries/requests. Davina said that she will use what I have provided previously (in my emails sent last week) about the situation in crafting a response to the Congressman. I have not yet seen the Congressman's inquiry. Davina and I agreed that once she drafts a response, RCRD (me) and WPD (likely Dan O'Lone) can review and edit it for accuracy. The other good source of information in preparing EPA's response to the Congressman (i.e., the 'happy' story in this unfortunate situation for AL citizens), is the BSE MSWLF's consultant's letter sent to ADEM (attached), which I forwarded to you all last week after receiving it from ADEM.

Davina – I have to take unplanned leave tomorrow, but will check my emails tomorrow night or early Friday morning, and quickly turn around your draft response letter once I review it. Please copy Dee and Meredith. Thank you.

Davy

From: Marraccini, Davina
Sent: Wednesday, April 18, 2018 4:15 PM
To: Pinkney, James <Pinkney.James@epa.gov>
Cc: Simonson, Davy <Simonson.Davy@epa.gov>
Subject: Re: AL Biosolids Statement

James,

I'm working on it. Will send something for review shortly

Sent from my iPhone

On Apr 18, 2018, at 4:11 PM, Pinkney, James <Pinkney.James@epa.gov> wrote:

Davy,

Do you have a status on the AL Biosolids statement?

James Pinkney
EPA Region 4 Office of External Affairs
61 Forsyth Street SW | Atlanta GA 30303
Phone: 404.562.9183 | mobile: 404.695.5503
Email: pinkney.james@epa.gov

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March 29, 2018

Alabama Department of
Environmental Management
Post Office Box 301463
Montgomery, Alabama 36130-1463

VIA UNITED PARCEL SERVICE

Attention: Mr. Eric Sanderson, Chief
Solid Waste Branch

RE: Response to Request for Additional Information
Renewal of Solid Waste Disposal Permit 37-48
Big Sky Environmental, LLC, Solid Waste Facility
Adamsville, Jefferson County, Alabama

Dear Mr. Sanderson:

On behalf of Big Sky Environmental, LLC (Big Sky), Highland Technical Services, Inc. (HTSI) is submitting this response to the request for additional information dated March 15, 2018, submitted by the Alabama Department of Environmental Management (ADEM) to Big Sky, to assist in renewal of the facility's Solid Waste Disposal Permit Number 37-48. The ADEM requests are shown below in italics with the Big Sky responses immediately following each request.

REQUEST: *Due to recent mining activities conducted at the site, the Department has requested that the facility's stormwater management plan be updated to include the design and narrative of the landfill's run-off control system in accordance with ADEM Admin. Code r. 335-13-4-.17(2) and (3). This includes volume calculations for a 24-hour, 25-year storm event. Additionally, an updated facility map which includes at a minimum: the permitted disposal area, biosolids handling area, biosolids land application and disposal area(s), stormwater flow directions, and control structures for a 24-hour, 25-year storm event is requested.*

RESPONSE: Neither the stormwater management system design nor the means of achieving compliance with the requirements of ADEM Admin, Code r. 335-13-4-.17(2) or (3) has changed due to the referenced mining activities. The pending permit renewal application proposes to adhere to the same stormwater management plan and design, as prepared by CDG Engineers and submitted by Construction Management Services, LLC in April 2005 and revised in September 2006. This plan and design were previously approved by the Department for the permit renewal on September 21, 2012, and for the initial permit issuance approved on August 6, 2007. Despite the presence of mining activities, as stated in the pending permit renewal application, the landfill operations would remain in Phase I of the overall design, i.e. a combined disposal area of 161.24 acres (66.24 acres MSW and 95 acres C/D) out of the total facility size of 1,522.7 acres. As such, the stormwater retention basin system designed by CDG Engineers would be sufficient to meet the required 24-hour, 25-year storm event, as reflected in Section 5.6 and Appendix 5.1 of the September 2006 permit application. Moreover, it should be noted that, as designed, the stormwater basins each include an additional two feet so as to ensure sufficient capacity for larger volumes than those resulting from the 24-hour, 25-year storm event.

However, based on previous discussions with the Department, Big Sky Environmental, LLC has filed an electronic Notice of Intent (eNOI) to re-locate the permitted outfall under their general NPDES permit, so as to sample landfill related stormwater discharge prior to its confluence with runoff from the mining operations. This request is currently pending with the ADEM Water Division.

REQUEST: *The Department has requested that a comprehensive nutrient management plan be submitted which includes details as to how the biosolids are managed at the facility in accordance with EPA's Part 503B Biosolids Program. The Department has also requested a detailed description of the biosolids handling process from receipt of the biosolids to landfill disposal and/or land application.*

RESPONSE: Due to concerns expressed by the public and the ADEM, Big Sky will no longer accept biosolids, originating in the States of New York and New Jersey, for disposal and/or land application at the Big Sky Adamsville facility. As such, Big Sky is of the opinion that a nutrient management plan will no longer be required.

As you are aware, the biosolids are delivered to the local area by rail and loaded to trucks for delivery to the Big Sky facility. It is our understanding that approximately 44 rail cars remain at one or more rail spurs in Jefferson and Walker Counties. Once the contents of the remaining rail cars are delivered to the Big Sky facility, no additional biosolids will be delivered via rail to the Big Sky Adamsville facility. The remaining biosolids will be disposed of in the active lined cell of the landfill under the following ADEM Waste Profile numbers:

| | |
|--------|--------|
| 160917 | 162134 |
| 161604 | 161538 |
| 161539 | 161534 |
| 162046 | 161530 |
| 162086 | 162135 |
| 161532 | |

Big Sky anticipates that the transportation and disposal of the remaining biosolids will require approximately 60 days to complete. Within 10 days following disposal of the final load of waste, Big Sky will notify the ADEM to terminate the waste approvals associated with the above-referenced Waste Profiles.

Highland Technical Services, Inc. and Big Sky Environmental, LLC hope that this response will assist the ADEM with the renewal of the facility's Solid Waste Disposal Permit. If you have any questions concerning this submittal or require any additional information, please contact our office at (205) 985-4874.

Sincerely,
HIGHLAND TECHNICAL SERVICES, INC.


William W. Cooch, P.G.
Principal Geologist

cc: Johnathon Click, VP of Operations

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Armstrong, Kathy

From: Zapata, Cesar
Sent: Tuesday, February 27, 2018 3:43 PM
To: Guzman, Humberto
Subject: RE: Big Sky Environmental Landfill - AI

Thank you Humberto.

César A. Zapata
Deputy Director
Water Protection Division
United States Environmental Protection Agency, Region 4

-----Original Message-----

From: Guzman, Humberto
Sent: Tuesday, February 27, 2018 3:41 PM
To: Zapata, Cesar <Zapata.Cesar@epa.gov>
Subject: RE: Big Sky Environmental Landfill - AI

Cesar,

I sent this complaint to Larry Lamberth and Davy Simonson last week. It's about an expansion of a landfill and potential effects to water. I think that it is for RCRA.

H

-----Original Message-----

From: Zapata, Cesar
Sent: Tuesday, February 27, 2018 3:37 PM
To: Guzman, Humberto <Guzman.Humberto@epa.gov>; Horsey, Maurice <Horsey.Maurice@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>
Subject: FW: Big Sky Environmental Landfill - AI

FYI

-----Original Message-----

From: Torres, Ramon
Sent: Tuesday, February 27, 2018 3:15 PM
To: Zapata, Cesar <Zapata.Cesar@epa.gov>
Subject: Re: Big Sky Environmental Landfill - AI

Thanks Cesar,

I am working on it and I will let you know soon.

Take care,

Sent from my iPhone

> On Feb 27, 2018, at 2:58 PM, Zapata, Cesar <Zapata.Cesar@epa.gov> wrote:

>

> Ramon,

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> FYI, not sure if this has made it to RCRD. If it has, please let me know who is dealing with it to coordinate a response.

>

> César A. Zapata

> Deputy Director

> Water Protection Division

> United States Environmental Protection Agency, Region 4

>

> -----Original Message-----

> From: Thomas, Chris

> Sent: Monday, February 26, 2018 8:11 AM

> To: Zapata, Cesar <Zapata.Cesar@epa.gov>; Horsey, Maurice <Horsey.Maurice@epa.gov>

> Cc: Davis, Molly <Davis.Molly@epa.gov>; Ellington, Natalie <Ellington.Natalie@epa.gov>

> Subject: FW: Big Sky Environmental Landfill - Al

>

> Fyi

>

> -----Original Message-----

> From: Ellington, Natalie

> Sent: Thursday, February 22, 2018 2:34 PM

> To: Davis, Molly <Davis.Molly@epa.gov>

> Cc: Thomas, Chris <Thomas.Chris@epa.gov>

> Subject: FW: Big Sky Environmental Landfill - Al

>

> Molly,

>

> As the Water Enforcement Branch Chief, this seems a request for your (and/or your staff's) involvement.

>

> Natalie

>

> -----Original Message-----

> From: David Eastis <mailto:davideastis@gmail.com>

> Sent: Wednesday, February 14, 2018 11:53 AM

> To: Ellington, Natalie <Ellington.Natalie@epa.gov>

> Cc: David Eastis <davideastis@gmail.com>

> Subject: Big Sky Environmental Landfill - Al

>

> Ms Ellington, I am representing Bluff Creek Fishing and Hunting Association (non profit) on the Warrior River in Alabama. We have learned recently of the Big Sky Environmental (BSE) Landfill dumping black sewage sludge from out of state on a landfill in Adamsville, Al.

> Despite the united protests (stench, flies, feral pigs, spills) from residents near and around the landfill, Black Warrior River Keeper's (BWRK) contradiction of BSE's statements of compliance and monitoring, and BWRK's statements of ADEM not holding BSE compliant and enforcing reported lack of monitoring water runoff, spills, and NOVs, it appears ADEM is going ahead with their approval of extending their permit. This has the potential of devastating consequences for the Warrior River, a water source for Birmingham, Jefferson county, Walker county and surrounding areas.

>

> Would you please call me at your earliest convenience.

>

> Many thanks,

>

> David Eastis

> 205-919-0711

> davideastis@gmail.com

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> Deputy Director
> Water Protection Division

> United States Environmental Protection Agency, Region 4

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> From: Thomas, Chris

> Sent: Monday, February 26, 2018 8:11 AM

> To: Zapata, Cesar <Zapata.Cesar@epa.gov>; Horsey, Maurice <Horsey.Maurice@epa.gov>

> Cc: Davis, Molly <Davis.Molly@epa.gov>; Ellington, Natalie <Ellington.Natalie@epa.gov>

> Subject: FW: Big Sky Environmental Landfill - Al

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> Sent: Thursday, February 22, 2018 2:34 PM

> To: Davis, Molly <Davis.Molly@epa.gov>

> Cc: Thomas, Chris <Thomas.Chris@epa.gov>

> Subject: FW: Big Sky Environmental Landfill - Al

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> Natalie

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> -----Original Message-----

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> Sent: Wednesday, February 14, 2018 11:53 AM

> To: Ellington, Natalie <Ellington.Natalie@epa.gov>

> Cc: David Eastis [mailto:davideastis@gmail.com]

> Subject: Big Sky Environmental Landfill - Al

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> Would you please call me at your earliest convenience.

>

> Many thanks,

>

> David Eastis

> 205-919-0711

> davideastis@gmail.com

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Armstrong, Kathy

From: barrino.reginald@epa.gov
Sent: Friday, July 13, 2018 8:54 AM
To: LKnickerbocker@adem.alabama.gov
Cc: Guzman, Humberto
Subject: FWD: (RCRA/Solid Waste - FY18-173247-3708-CV) Referred to Region - Alabama

07/13/2018

SUBJECT: FWD: (RCRA/Solid Waste - FY18-173247-3708-CV) Referred to Region - Alabama
FROM: barrino.reginald@epa.gov
TO: LKnickerbocker@adem.alabama.gov
CC: guzman.humberto@epa.gov

Linda - FYI. Thank you, Reginald

-----Original Message-----

7/12/2018 4:21 PM

HQ LEAD NUMBER: FY18-173247-3708-CV

SUBJECT: Referred to Region - Alabama

FROM:

TO:

Alleged Violator's Name: Big Sky Environmental

Alleged Violator's Address: 5100 Flat Top Road Adamsville ,AL 35005

Alleged Violator's City: ADAMSVILLE,GRAYSVILLE

Alleged Violator's State: Alabama

Alleged Violator's Zip: 35005

Tip or Complaint: This dump is located right beside Village Creek and The Locust Fork of Warrior River. Its groundwater as well as runoff goes right into these bodies of water. The last 2 years they have been accepting sewage from New York and New Jersey in train cars that are leaking sewage their whole route and even sit on the railroad tracks for weeks in different areas. Yes I do wish to remain anonymous as the council members of Big Sky Environmental are influential people in my community that could cause problems such as one of the members being the mayor of Adamsville. Its hard to believe that a dump would have ever been allowed to be so close to these bodies of water. Village Creek itself is very nasty given it goes through the center of Birmingham before going into the Warrior. it has millions of tons of plastic bottles lining its shores almost its whole entirety before going into the river by Miller power plant,so it doesnt need the extra polluted groundwater and runoff from the dump . I hope this can be seriously investigated.Look at Google maps for yourself,,,see Village Creek and the Warrior river right beside the dump.

Common sense tells us the river is a low spot, right where all the water goes. This place should be a major violation just in its location, and certainly having a human waste dump.

Violation Still Occurring? Yes

State DEP/DEQ/DEM Notified? No



Enforcement and Compliance Information Center (ECIC)

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[ECIC Administration Control Panel](#)
[Civil Tips & Complaints Search](#)
[Civil Tips & Complaints Search Query Result\(s\)](#)
[Civil Tips & Complaints Detail](#)

Civil Tips & Complaints Detail

[File a NEW complaint](#)



Message reviewed
on 7/13/2018

[Edit data for this message](#)

Subject: Referred to Region - Alabama

Tip ID: 173247

Date: 07/12/2018

Time: 4:21:59 PM

Recipient: Regional Tip and/or Complaint

Recipient Email:

Referred Directly

Referred By Criminal

3708 - RCRA/Solid Waste ▼

HQ Lead Number:

FY18-173247-3708-CV

[clear](#)

Ref. Lead Number:

Case Number:

Submitter Info

From:

Email:

Company:

Address:

City:

State:

Zip:

Phone:

IP Address 68.184.78.182

Official: State

Statute: RCRA

Action: Unspecified Government Action

Disposition: Lead Closed

☐ Check if the message is SPAM

[Windows Live Local URL](#)

[\[check URL\]](#)

Alleged Violator/Violation Info

Name: Big Sky Environmental

Address: 5100 Flat Top Road
Adamsville, AL 35005

City: ADAMSVILLE, GRAYSVILLE

State: Alabama

Zip: 35005

Phone:

Latitude:

Longitude:

FRS ID:

System ID:

Violation

Date: 01/01/2008

Category: (select all that apply)

Region 4 - Multimedia (R/W)

Region 4 - Open Burning

Region 4 - Other

Region 4 - RCRA

Region 4 - SDWA

Region 4 - Sewage

Language:

English ▼

[Submit](#)

[Reset](#)

Violation still occurring?: Yes

Notified state DEP, DEQ, or DEM?: No

Department contact:**Tip or Complaint:**

This dump is located right beside Village Creek and The Locust Fork of Warrior River. Its groundwater as well as runoff goes right into these bodys of water. The last 2 years they have been accepting sewage from New York and New Jersey in train cars that are leaking sewage their whole route and even sit on the railroad tracks for weeks in different areas. Yes I do wish to remain anonymous as the council members of Big Sky Environmental are influential people in my community that could cause problems such as one of the members being the mayor of Adamsville. Its hard to believe that a dump would have ever been allowed to be so close to these bodies of water. Village Creek itself is very nasty given it goes through the center of Birmingham before going into the Warrior. it has millions of tons of plastic bottles lining its shores almost its whole entirety before going into the river by Miller power plant,so it doesnt need the extra polluted groundwater and runoff from the dump . I hope this can be seriously investigated.Look at Google maps for yourself,,,see Village Creek and the Warrior river right beside the dump. Common sense tells us the river is a low spot,right where all the water goes. This place should be a major violation just in its location,and certainly having a human waste dump.

Update to Tip or Complaint:**Specific Directions to Site:****Attached Files:****Referrer:****URL for related document:**

| Intent | Type | Media | Entity |
|--------------------|--------------------|--------------|---------------------|
| Accidental | Release | Land | Individual |
| Intentional | Dump/Buried | Water | Company |
| Unknown | Spill | Air | Government/Military |
| | Spray | Worker | Unknown |
| | Fill | Documents | |
| | Falsified | | |

[Edit Data For This Message](#)
Continued Communication**Date Sent:** July 13, 2018**Time Sent:** 8:53:16 AM**To:** NONE**Cc:****From:** Region**Subject:** Final Disposition**Message:** HQ Lead Number: FY18-173247-3708-CV

Potential Violator's State: Alabama

Reference Lead Number:

Potential Violator's Name: Big Sky Environmental

Case Number:

Official: State
Statue: RCRA
Action: Unspecified Government Action
Disposition: Lead Closed

Date Sent: July 13, 2018

Time Sent: 8:53:05 AM

To: LKnickerbocker@adem.alabama.gov

Cc: guzman.humberto@epa.gov

From: barrino.reginald@epa.gov

Subject: FWD: (RCRA/Solid Waste - FY18-173247-3708-CV) Referred to Region - Alabama

Message: Linda - FYI. Thank you, Reginald

Date Sent: July 13, 2018

Time Sent: 8:37:14 AM

To: Region 4

Cc:

From: HQ Criminal

Subject: Final Disposition

Message: HQ Lead Number: FY18-173247-3709
Potential Violator's State: Alabama
Reference Lead Number:
Potential Violator's Name: Big Sky Environmental
Case Number:

Official: Region
Statue: Unassigned
Action: Under Review
Disposition: N/A

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Armstrong, Kathy

From: O'Lone, Dan
Sent: Tuesday, March 20, 2018 7:26 AM
To: Guzman, Humberto
Subject: Fwd: Big Sky Environmental Landfill - AI

I was looking for something else, but came across this. I thought I'd forward it since we were talking about the situation there.

Dan

Dan O'Lone, Acting Chief
NPEB permitting and
Enforcement Branch

Sent from my iPhone

Begin forwarded message:

From: "Guzman, Humberto" <Guzman.Humberto@epa.gov>
Date: February 28, 2018 at 13:26:49 EST
To: "O'Lone, Dan" <Olone.Dan@epa.gov>
Subject: FW: Big Sky Environmental Landfill - AI

-----Original Message-----

From: Zapata, Cesar
Sent: Tuesday, February 27, 2018 3:43 PM
To: Guzman, Humberto <Guzman.Humberto@epa.gov>
Subject: RE: Big Sky Environmental Landfill - AI

Thank you Humberto.

César A. Zapata
Deputy Director
Water Protection Division
United States Environmental Protection Agency, Region 4

-----Original Message-----

From: Guzman, Humberto
Sent: Tuesday, February 27, 2018 3:41 PM
To: Zapata, Cesar <Zapata.Cesar@epa.gov>
Subject: RE: Big Sky Environmental Landfill - AI

Cesar,

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From: Zapata, Cesar

Sent: Tuesday, February 27, 2018 3:37 PM

To: Guzman, Humberto <Guzman.Humberto@epa.gov>; Horsey, Maurice <Horsey.Maurice@epa.gov>;

O'Lone, Dan <O'one.Dan@epa.gov>

Subject: FW: Big Sky Environmental Landfill - AI

FYI

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From: Torres, Ramon

Sent: Tuesday, February 27, 2018 3:15 PM

To: Zapata, Cesar <Zapata.Cesar@epa.gov>

Subject: Re: Big Sky Environmental Landfill - AI

Thanks Cesar,

I am working on it and I will let you know soon.

Take care,

Sent from my iPhone

On Feb 27, 2018, at 2:58 PM, Zapata, Cesar <Zapata.Cesar@epa.gov> wrote:

Ramon,

FYI, not sure if this has made it to RCRD. If it has, please let me know who is dealing with it to coordinate a response.

César A. Zapata

Deputy Director

Water Protection Division

United States Environmental Protection Agency, Region 4

-----Original Message-----

From: Thomas, Chris

Sent: Monday, February 26, 2018 8:11 AM

To: Zapata, Cesar <Zapata.Cesar@epa.gov>; Horsey, Maurice <Horsey.Maurice@epa.gov>

Cc: Davis, Molly <Davis.Molly@epa.gov>; Ellington, Natalie <Ellington.Natalie@epa.gov>

Subject: FW: Big Sky Environmental Landfill - AI

Fyi

-----Original Message-----

From: Ellington, Natalie
Sent: Thursday, February 22, 2018 2:34 PM
To: Davis, Molly <Davis.Molly@epa.gov>
Cc: Thomas, Chris <Thomas.Chris@epa.gov>
Subject: FW: Big Sky Environmental Landfill - AI

Molly,

As the Water Enforcement Branch Chief, this seems a request for your (and/or your staff's) involvement.

Natalie

-----Original Message-----

From: David Eastis <<mailto:davideastis@gmail.com>>
Sent: Wednesday, February 14, 2018 11:53 AM
To: Ellington, Natalie <Ellington.Natalie@epa.gov>
Cc: David Eastis <davideastis@gmail.com>
Subject: Big Sky Environmental Landfill - AI

Ms Ellington, I am representing Bluff Creek Fishing and Hunting Association (non profit) on the Warrior River in Alabama. We have learned recently of the Big Sky Environmental (BSE) Landfill dumping black sewage sludge from out of state on a landfill in Adamsville, Al.

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Would you please call me at your earliest convenience.

Many thanks,

David Eastis
205-919-0711

uavideastis@gmail.com

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Armstrong, Kathy

From: Guzman, Humberto
Sent: Monday, March 12, 2018 12:01 PM
To: Simonson, Davy
Subject: FW: Big Sky Environmental Landfill - AI

Davy,

How are you today? I received your voicemail message. We did not reply, so go ahead and give him a call.

Humberto

-----Original Message-----

From: Zapata, Cesar
Sent: Tuesday, February 27, 2018 3:37 PM
To: Guzman, Humberto <Guzman.Humberto@epa.gov>; Horsey, Maurice <Horsey.Maurice@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>
Subject: FW: Big Sky Environmental Landfill - AI

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> Deputy Director
> Water Protection Division

> United States Environmental Protection Agency, Region 4

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> Sent: Monday, February 26, 2018 8:11 AM

> To: Zapata, Cesar <Zapata.Cesar@epa.gov>; Horsey, Maurice <Horsey.Maurice@epa.gov>

> Cc: Davis, Molly <Davis.Molly@epa.gov>; Ellington, Natalie <Ellington.Natalie@epa.gov>

> Subject: FW: Big Sky Environmental Landfill - AI

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> To: Davis, Molly <Davis.Molly@epa.gov>

> Cc: Thomas, Chris <Thomas.Chris@epa.gov>

> Subject: FW: Big Sky Environmental Landfill - AI

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> Natalie

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> David Eastis

> 205-919-0711

> davideastis@gmail.com

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Armstrong, Kathy

From: Marraccini, Davina
Sent: Thursday, April 19, 2018 1:05 PM
To: Simonson, Davy; O'Lone, Dan; Guzman, Humberto
Cc: Lincoln, Larry; Rodgers-Smith, Delores; Anderson, Meredith; Wise, Allison; Pinkney, James
Subject: FW: Town of Parrish, AL
Attachments: Big Sky letter to ADEM 3_29_2018.pdf

All,

Please see the straw response to the Congressman's representative about the Mayor's email. I highlighted areas where I need input from either WPD or RCRA. Please send your suggestions NLT 10 am tomorrow, if possible.

DRAFT EMAIL RESPONSE:

Paul,

Thank you for forwarding the email from Mayor Hall expressing concerns about railcars containing biosolids that had been stranded in the Town of Parrish.

As the Mayor notes, and per the attached letter on behalf of Big Sky Environmental, LLC (Big Sky) to the Alabama Department of Environmental Management (ADEM), EPA understands that the biosolids contained in the railcars are in the process of being delivered to the Big Sky facility. According to the letter, the transfer is expected to be completed by May 28. [Can we confirm with ADEM what the status is and add a sentence to reflect how many rail cars have been moved?] The letter also notes that, in response to concerns from the public and ADEM, Big Sky will no longer accept biosolids originating from New York and New Jersey for disposal or land application at their Adamsville facility.

EPA was contacted by Mayor Hall in mid-March, prior to learning about Big Sky's aforementioned decisions. Staff in the Resource Conservation and Recovery Program explained EPA and ADEM's limited role. [Add language expressing what our role is from both the RCRA and water sides. Are there existing federal and/or state rules regarding where and how much of this material can be off loaded? Can we confirm this is a "non-hazardous" material and that EPA has little to no concerns? If not, what is our message? Are we aware of any notification requirements at the federal/state/local levels when the biosolids are transported into a municipality? Was EPA the source of the statement referenced by the Mayor that "we cannot measure odor"? If so can we expand upon that?]

In her email, Mayor Hall notes Big Sky Environmental is hoping to bring more material into Parrish location as a disbursement center. [Can we contact ADEM to confirm this? If true, does EPA and/or ADEM have any role?]

Lastly, the health-related concerns Mayor Hall cites, including breathing issues, would be more appropriately addressed by XX.

EPA will continue to monitor this situation and provide input when appropriate. If you have questions or need additional information from the EPA, please do not hesitate to contact me directly.

Davina Marraccini
 Public Affairs Specialist
 U.S. EPA Region 4
 404-562-8293 (office)

404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

*** Save trees! Please don't print this message unless necessary.

Begin forwarded message:

From: "Skane, Elizabeth" <Skane.Elizabeth@epa.gov>
Date: April 16, 2018 at 4:06:42 PM EDT
To: "Marraccini, Davina" <Marraccini.Davina@epa.gov>
Cc: "Levine, Carolyn" <Levine.Carolyn@epa.gov>
Subject: FW: Town of Parrish, AL

Hi Davina, we got the inquiry below from Cong. Aderholt's Jasper, AL District Field Director. Would you be so kind as to follow up directly with the staffer at your earliest convenience? Many thanks!

Cc Carolyn for OLEM awareness

Best,
Elizabeth

Elizabeth Skane ♦ 202.564.5696
US Environmental Protection Agency
Office of Congressional Affairs
WJC North 3443S

From: Eades, Cassaundra On Behalf Of OCIRmail
Sent: Monday, April 16, 2018 2:58 PM
To: Skane, Elizabeth <Skane.Elizabeth@epa.gov>; Borum, Denis <Borum.Denis@epa.gov>; Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>
Subject: FW: Town of Parrish, AL

From: Housel, Paul [<mailto:Paul.Housel@mail.house.gov>]
Sent: Thursday, March 01, 2018 12:05 PM
To: OCIRmail <OCIRmail@epa.gov>
Subject: Town of Parrish, AL

We received the following email from the Mayor of Parrish. Any direction or assistance you can provide will be greatly appreciated.

I would like to try to explain the situation we are facing here in Parrish. Unbeknownst to anyone in the Town of Parrish, including the mayor's office, containers of Bio-solids (also known as sewer sludge) started arriving at the Norfolk Southern rail yard sometime at the end of January. Currently there are 42 train cars, each has 6 containers, each container holds 20 tons of material (or 40,000 pounds) of material. So there is approximately 10,080,000 pounds of human waste, bio-solids, or sewage sludge here in Parrish. Yes you read that correctly 10 million pounds.

My understanding is this is a non-hazardous material. And the EPA and ADEM have little to no concerns about this material. So even though there is such a large amount they are not offering any help to the Town of Parrish. I understand that this material may not be harmful to the environment. But what about the quality of life of the people of Parrish? The odor/stench off of this material is horrendous. I am not for hyperbole, so please understand that I am not exaggerating when I tell you at times it smells as if there are rotting carcasses all over the town of Parrish. This is not an everyday occurrence....but it has happened 3 days in the last week. This stench is also not just a "whiff" or light smell. The stench is overpowering and nauseating. It is causing the residents of Parrish to barricade inside. They can not go outside to sit on their porch, or work in their yards. The fumes permeate the entire town!

Next door to the Rail yard is where Parrish Park and Rec play baseball and softball. Children are being subjected to this stench! Our Spring Festival will be held at the old Parrish High School and it is adjacent to the Rail Road. The Ultimate Fair will be here in July. Can you imagine the problem if the temperatures are in the 90's? It will be a nightmare for the people of Parrish.

The Town of Parrish has been thrust into an unfair and uninvited situation. We have large corporations shipping this waste material into municipalities and very little can be done to fight it. Most rural towns like Parrish do not have zoning laws and regulations (something I am hoping to fix). Incredibly, this material can be shipped into a municipality and not a word needs to be said to any municipal official. These are things that need to change.

Smaller towns do not have the funds to fight these legal battles, and I believe that is one reason this happens. I hope that someone in Washington DC is listening and can truly understand the situation that I am facing. My question is this....is not the quality of life for the Town of Parrish just as important as Birmingham? Tuscaloosa? This material should not be allowed to enter any municipal district! The size of the town should not matter. And their ability to pay an attorney to fight the situation should not be the determining factor as to whether this type of material should be allowed to stay inside a town's boundaries!

You would think that this is common sense. However, I have had little to no help from ADEM, Health officials, or the EPA. We have people in Parrish who are having difficulty breathing due to the noxious fumes this material is putting off and I can get no help from these offices. I was told that "we can't measure odor". A person with respiratory issues can have a problem with their breathing when there are noxious fumes or even perfume in the air! I have several people complaining of breathing issues, but still we are receiving no help from the agencies that are supposed to be protecting the citizens.

I am hoping that the situation here in Parrish will shed light on this problem. I would like to see new guidelines in regards to where and how much of this material can be off loaded. It should never be allowed to be off loaded in a populated area. It is a health hazard and an incredible nuisance. I just can not stress to you enough how detrimentally this has affected the quality of life for the residents of Parrish.

As an update....the containers have finally been given approval to be transferred to Adamsville. However, Big Sky Environmental is hoping to bring more material into Parrish and use our location as a dispersment center. We will be fighting that.

Thank you for your time,
Heather Hall
Mayor
Town of Parrish

Paul Housel
District Field Director
Office of Congressman Robert Aderholt
1710 Alabama Avenue, Room 247
Jasper, AL 35501
Phone: 205-221-2310
Fax: 205-221-9035



March 29, 2018

Alabama Department of
Environmental Management
Post Office Box 301463
Montgomery, Alabama 36130-1463

VIA UNITED PARCEL SERVICE

Attention: Mr. Eric Sanderson, Chief
Solid Waste Branch

RE: Response to Request for Additional Information
Renewal of Solid Waste Disposal Permit 37-48
Big Sky Environmental, LLC, Solid Waste Facility
Adamsville, Jefferson County, Alabama

Dear Mr. Sanderson:

On behalf of Big Sky Environmental, LLC (Big Sky), Highland Technical Services, Inc. (HTSI) is submitting this response to the request for additional information dated March 15, 2018, submitted by the Alabama Department of Environmental Management (ADEM) to Big Sky, to assist in renewal of the facility's Solid Waste Disposal Permit Number 37-48. The ADEM requests are shown below in italics with the Big Sky responses immediately following each request.

REQUEST: *Due to recent mining activities conducted at the site, the Department has requested that the facility's stormwater management plan be updated to include the design and narrative of the landfill's run-off control system in accordance with ADEM Admin. Code r. 335-13-4-.17(2) and (3). This includes volume calculations for a 24-hour, 25-year storm event. Additionally, an updated facility map which includes at a minimum: the permitted disposal area, biosolids handling area, biosolids land application and disposal area(s), stormwater flow directions, and control structures for a 24-hour, 25-year storm event is requested.*

RESPONSE: Neither the stormwater management system design nor the means of achieving compliance with the requirements of ADEM Admin. Code r. 335-13-4-.17(2) or (3) has changed due to the referenced mining activities. The pending permit renewal application proposes to adhere to the same stormwater management plan and design, as prepared by CDG Engineers and submitted by Construction Management Services, LLC in April 2005 and revised in September 2006. This plan and design were previously approved by the Department for the permit renewal on September 21, 2012, and for the initial permit issuance approved on August 6, 2007. Despite the presence of mining activities, as stated in the pending permit renewal application, the landfill operations would remain in Phase I of the overall design, i.e. a combined disposal area of 161.24 acres (66.24 acres MSW and 95 acres C/D) out of the total facility size of 1,522.7 acres. As such, the stormwater retention basin system designed by CDG Engineers would be sufficient to meet the required 24-hour, 25-year storm event, as reflected in Section 5.6 and Appendix 5.1 of the September 2006 permit application. Moreover, it should be noted that, as designed, the stormwater basins each include an additional two feet so as to ensure sufficient capacity for larger volumes than those resulting from the 24-hour, 25-year storm event.

However, based on previous discussions with the Department, Big Sky Environmental, LLC has filed an electronic Notice of Intent (eNOI) to re-locate the permitted outfall under their general NPDES permit, so as to sample landfill related stormwater discharge prior to its confluence with runoff from the mining operations. This request is currently pending with the ADEM Water Division.

REQUEST: *The Department has requested that a comprehensive nutrient management plan be submitted which includes details as to how the biosolids are managed at the facility in accordance with EPA's Part 503B Biosolids Program. The Department has also requested a detailed description of the biosolids handling process from receipt of the biosolids to landfill disposal and/or land application.*

RESPONSE: Due to concerns expressed by the public and the ADEM, Big Sky will no longer accept biosolids, originating in the States of New York and New Jersey, for disposal and/or land application at the Big Sky Adamsville facility. As such, Big Sky is of the opinion that a nutrient management plan will no longer be required.

As you are aware, the biosolids are delivered to the local area by rail and loaded to trucks for delivery to the Big Sky facility. It is our understanding that approximately 44 rail cars remain at one or more rail spurs in Jefferson and Walker Counties. Once the contents of the remaining rail cars are delivered to the Big Sky facility, no additional biosolids will be delivered via rail to the Big Sky Adamsville facility. The remaining biosolids will be disposed of in the active lined cell of the landfill under the following ADEM Waste Profile numbers:

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Big Sky anticipates that the transportation and disposal of the remaining biosolids will require approximately 60 days to complete. Within 10 days following disposal of the final load of waste, Big Sky will notify the ADEM to terminate the waste approvals associated with the above-referenced Waste Profiles.

Highland Technical Services, Inc. and Big Sky Environmental, LLC hope that this response will assist the ADEM with the renewal of the facility's Solid Waste Disposal Permit. If you have any questions concerning this submittal or require any additional information, please contact our office at (205) 985-4874.

Sincerely,
HIGHLAND TECHNICAL SERVICES, INC.


William W. Cooch, P.G.
Principal Geologist

cc: Johnathon Click, VP of Operations

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Armstrong, Kathy

From: Guzman, Humberto
Sent: Thursday, February 22, 2018 2:47 PM
To: Lamberth, Larry; Simonson, Davy
Cc: Davis, Molly; O'Lone, Dan; Ellington, Natalie
Subject: FW: Big Sky Environmental Landfill - Al

Larry and Davy,

How are you today? Do you know about this permit extension for this landfill in Alabama? If yes, has the landfill had any problems especially runoff into the Warrior River? Do you want to call Mr. Eastis?

Thank you,
Humberto

-----Original Message-----

From: David Eastis [mailto:davideastis@gmail.com]
Sent: Wednesday, February 14, 2018 11:53 AM
To: Ellington, Natalie <Ellington.Natalie@epa.gov>
Cc: David Eastis <davideastis@gmail.com>
Subject: Big Sky Environmental Landfill - Al

Ms Ellington, I am representing Bluff Creek Fishing and Hunting Association (non profit) on the Warrior River in Alabama. We have learned recently of the Big Sky Environmental (BSE) Landfill dumping black sewage sludge from out of state on a landfill in Adamsville, Al.

Despite the united protests (stench, flies, feral pigs, spills) from residents near and around the landfill, Black Warrior River Keeper's (BWRK) contradiction of BSE's statements of compliance and monitoring, and BWRK's statements of ADEM not holding BSE compliant and enforcing reported lack of monitoring water runoff, spills, and NOVs, it appears ADEM is going ahead with their approval of extending their permit. This has the potential of devastating consequences for the Warrior River, a water source for Birmingham, Jefferson county, Walker county and surrounding areas.

Would you please call me at your earliest convenience.

Many thanks,

David Eastis
205-919-0711
davideastis@gmail.com

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Armstrong, Kathy

From: Davis, Molly
Sent: Thursday, February 22, 2018 2:37 PM
To: O'Lone, Dan; Guzman, Humberto
Subject: FW: Big Sky Environmental Landfill - AI

Categories: Record Saved - Shared

Dan and Humberto,

I'm not sure if this is an enforcement matter we would handle or is it something we might send to CID? Please advise! Molly

-----Original Message-----

From: Ellington, Natalie
Sent: Thursday, February 22, 2018 2:34 PM
To: Davis, Molly <Davis.Molly@epa.gov>
Cc: Thomas, Chris <Thomas.Chris@epa.gov>
Subject: FW: Big Sky Environmental Landfill - AI

Molly,

As the Water Enforcement Branch Chief, this seems a request for your (and/or your staff's) involvement.

Natalie

-----Original Message-----

From: David Eastis [mailto:davideastis@gmail.com]
Sent: Wednesday, February 14, 2018 11:53 AM
To: Ellington, Natalie <Ellington.Natalie@epa.gov>
Cc: David Eastis [mailto:davideastis@gmail.com]
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Would you please call me at your earliest convenience.

Many thanks,

David Eastis
205-919-0711
david eastis@gmail.com

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Armstrong, Kathy

From: Guzman, Humberto
Sent: Wednesday, February 28, 2018 1:27 PM
To: O'Lone, Dan
Subject: FW: Big Sky Environmental Landfill - AI

-----Original Message-----

From: Zapata, Cesar
Sent: Tuesday, February 27, 2018 3:43 PM
To: Guzman, Humberto <Guzman.Humberto@epa.gov>
Subject: RE: Big Sky Environmental Landfill - AI

Thank you Humberto.

César A. Zapata
Deputy Director
Water Protection Division
United States Environmental Protection Agency, Region 4

-----Original Message-----

From: Guzman, Humberto
Sent: Tuesday, February 27, 2018 3:41 PM
To: Zapata, Cesar <Zapata.Cesar@epa.gov>
Subject: RE: Big Sky Environmental Landfill - AI

Cesar,

I sent this complaint to Larry Lamberth and Davy Simonson last week. It's about an expansion of a landfill and potential effects to water. I think that it is for RCRA.

H

-----Original Message-----

From: Zapata, Cesar
Sent: Tuesday, February 27, 2018 3:37 PM
To: Guzman, Humberto <Guzman.Humberto@epa.gov>; Horsey, Maurice <Horsey.Maurice@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>
Subject: FW: Big Sky Environmental Landfill - AI

FYI

-----Original Message-----

From: Torres, Ramon
Sent: Tuesday, February 27, 2018 3:15 PM

To: Zapata, Cesar <Zapata.Cesar@epa.gov>
Subject: Re: Big Sky Environmental Landfill - AI

Thanks Cesar,

I am working on it and I will let you know soon.

Take care,

Sent from my iPhone

> On Feb 27, 2018, at 2:58 PM, Zapata, Cesar <Zapata.Cesar@epa.gov> wrote:

>

> Ramon,

>

> FYI, not sure if this has made it to RCRD. If it has, please let me know who is dealing with it to coordinate a response.

>

> César A. Zapata

> Deputy Director

> Water Protection Division

> United States Environmental Protection Agency, Region 4

>

> -----Original Message-----

> From: Thomas, Chris

> Sent: Monday, February 26, 2018 8:11 AM

> To: Zapata, Cesar <Zapata.Cesar@epa.gov>; Horsey, Maurice <Horsey.Maurice@epa.gov>

> Cc: Davis, Molly <Davis.Molly@epa.gov>; Ellington, Natalie <Ellington.Natalie@epa.gov>

> Subject: FW: Big Sky Environmental Landfill - AI

>

> Fyi

>

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> To: Davis, Molly <Davis.Molly@epa.gov>

> Cc: Thomas, Chris <Thomas.Chris@epa.gov>

> Subject: FW: Big Sky Environmental Landfill - AI

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> Molly,

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> As the Water Enforcement Branch Chief, this seems a request for your (and/or your staff's) involvement.

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> Natalie

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> Cc: David Eastis <davideastis@gmail.com>

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>

> Would you please call me at your earliest convenience.

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> Many thanks,

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> David Eastis

> 205-919-0711

> davideastis@gmail.com

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> United States Environmental Protection Agency, Region 4

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> **Cc:** Davis, Molly <Davis.Molly@epa.gov>; Ellington, Natalie <Ellington.Natalie@epa.gov>

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> Many thanks,

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> David Eastis

> 205-919-0711

> davideastis@gmail.com

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Armstrong, Kathy

44

From: Zapata, Cesar
Sent: Tuesday, February 27, 2018 2:59 PM
To: Torres, Ramon
Cc: Davis, Molly; Guzman, Humberto; Horsey, Maurice; O'Lone, Dan
Subject: FW: Big Sky Environmental Landfill - AI

Ramon,

FYI, not sure if this has made it to RCRD. If it has, please let me know who is dealing with it to coordinate a response.

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United States Environmental Protection Agency, Region 4

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205-919-0711
davideastis@gmail.com

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Armstrong, Kathy

From: Guzman, Humberto
Sent: Friday, July 13, 2018 9:00 AM
To: Stearns, Brad
Cc: Barrino, Reginald
Subject: FW: (RCRA/Solid Waste - FY18-173247-3708-CV) Referred to Region - Alabama

Brad,

How are you today? You already know about this one. This complaint was also sent to Linda Knickerbocker.

Thank you,
Humberto

From: barrino.reginald@epa.gov [mailto:barrino.reginald@epa.gov]
Sent: Friday, July 13, 2018 8:54 AM
To: LKnickerbocker@adem.alabama.gov
Cc: Guzman, Humberto <Guzman.Humberto@epa.gov>
Subject: FWD: (RCRA/Solid Waste - FY18-173247-3708-CV) Referred to Region - Alabama

07/13/2018

SUBJECT: FWD: (RCRA/Solid Waste - FY18-173247-3708-CV) Referred to Region - Alabama
FROM: barrino.reginald@epa.gov
TO: LKnickerbocker@adem.alabama.gov
CC: guzman.humberto@epa.gov

Linda - FYI. Thank you, Reginald

-----Original Message-----

7/12/2018 4:21 PM

HQ LEAD NUMBER: FY18-173247-3708-CV

SUBJECT: Referred to Region - Alabama

FROM:

TO:

Alleged Violator's Name: Big Sky Environmental

Alleged Violator's Address: 5100 Flat Top Road Adamsville ,AL 35005

Alleged Violator's City: ADAMSVILLE, GRAYSVILLE

Alleged Violator's State: Alabama

Alleged Violator's Zip: 35005

Tip or Complaint: This dump is located right beside Village Creek and The Locust Fork of Warrior River. Its groundwater as well as runoff goes right into these bodys of water. The last 2 years they have been accepting sewage from New York and New Jersey in train cars that are leaking sewage their whole route and even sit on the railroad tracks for weeks in different areas. Yes I do wish to remain anonymous as the council members of Big Sky Environmental are influential people in my community that could cause problems such as one of the members being the mayor of Adamsville. Its hard to believe that a dump would have ever been allowed to be so close to these bodies of water. Village Creek itself is very nasty given it goes through the center of Birmingham before going into the Warrior. it has millions of tons of plastic bottles lining its shores almost its whole entirety before going into the river by Miller power plant,so it doesnt need the extra polluted groundwater and runoff from the dump . I hope this can be seriously investigated.Look at Google maps for yourself,,,see Village Creek and the Warrior river right beside the dump. Common sense tells us the river is a low spot,right where all the water goes. This place should be a major violation just in its location,and certainly having a human waste dump.

Violation Still Occurring? Yes

State DEP/DEQ/DEM Notified? No

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Armstrong, Kathy

From: Simonson, Davy
Sent: Thursday, April 12, 2018 2:52 PM
To: Rodgers-Smith, Delores; Anderson, Meredith; Torres, Ramon; Monell, Carol; McMillan, Laura; Marraccini, Davina; Wise, Allison; Webster, James; O'Lone, Dan; Zapata, Cesar; Guzman, Humberto; Lincoln, Larry
Cc: Simonson, Davy
Subject: AL Biosolids Issue - FW: Big Sky
Attachments: ADEM Response 3-29-2018 Rev2.pdf
Importance: High

FYI, biosolids from NY/NJ will no longer be disposed at the Big Sky Environmental MSWLF. Please see the attached letter.
-DS

From: Sanderson, Eric [mailto:ELS@adem.alabama.gov]
Sent: Thursday, April 12, 2018 2:27 PM
To: Simonson, Davy <Simonson.Davy@epa.gov>
Subject: FW: Big Sky

Davy,

Per our discussion....

Eric

Eric Sanderson, P.E.
Chief, Solid Waste Branch
Land Division
Alabama Department of Environmental Management
1400 Coliseum Boulevard
Montgomery, AL 36110-2059

(334) 271-7755
els@adem.alabama.gov



March 29, 2018

Alabama Department of
Environmental Management
Post Office Box 301463
Montgomery, Alabama 36130-1463

VIA UNITED PARCEL SERVICE

Attention: Mr. Eric Sanderson, Chief
Solid Waste Branch

RE: Response to Request for Additional Information
Renewal of Solid Waste Disposal Permit 37-48
Big Sky Environmental, LLC, Solid Waste Facility
Adamsville, Jefferson County, Alabama

Dear Mr. Sanderson:

On behalf of Big Sky Environmental, LLC (Big Sky), Highland Technical Services, Inc. (HTSI) is submitting this response to the request for additional information dated March 15, 2018, submitted by the Alabama Department of Environmental Management (ADEM) to Big Sky, to assist in renewal of the facility's Solid Waste Disposal Permit Number 37-48. The ADEM requests are shown below in italics with the Big Sky responses immediately following each request.

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Sincerely,
HIGHLAND TECHNICAL SERVICES, INC.


William W. Cooch, P.G.
Principal Geologist

cc: Johnathon Click, VP of Operations

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O'Lone, Dan

47

From: Davis, Molly
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To: O'Lone, Dan; Guzman, Humberto
Subject: FW: Big Sky Environmental Landfill - AI

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Sent: Thursday, February 22, 2018 2:34 PM
To: Davis, Molly <Davis.Molly@epa.gov>
Cc: Thomas, Chris <Thomas.Chris@epa.gov>
Subject: FW: Big Sky Environmental Landfill - AI

Molly,

As the Water Enforcement Branch Chief, this seems a request for your (and/or your staff's) involvement.

Natalie

-----Original Message-----

From: David Eastis [mailto:davideastis@gmail.com]
Sent: Wednesday, February 14, 2018 11:53 AM
To: Ellington, Natalie <Ellington.Natalie@epa.gov>
Cc: David Eastis [mailto:davideastis@gmail.com]
Subject: Big Sky Environmental Landfill - AI

Ms Ellington, I am representing Bluff Creek Fishing and Hunting Association (non profit) on the Warrior River in Alabama. We have learned recently of the Big Sky Environmental (BSE) Landfill dumping black sewage sludge from out of state on a landfill in Adamsville, AL.

Despite the united protests (stench, flies, feral pigs, spills) from residents near and around the landfill, Black Warrior River Keeper's (BWRK) contradiction of BSE's statements of compliance and monitoring, and BWRK's statements of ADEM not holding BSE compliant and enforcing reported lack of monitoring water runoff, spills, and NOV's, it appears ADEM is going ahead with their approval of extending their permit. This has the potential of devastating consequences for the Warrior River, a water source for Birmingham, Jefferson county, Walker county and surrounding areas.

Would you please call me at your earliest convenience.

Many thanks,

David Eastis
205-919-0711
davideastis@gmail.com

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From: Guzman, Humberto
To: Lamberth, Larry; Simonson, Davy
Cc: Davis, Molly; O'Lone, Dan; Ellington, Natalie
Subject: FW: Big Sky Environmental Landfill - AI
Date: Thursday, February 22, 2018 2:47:27 PM

Larry and Davy,

How are you today? Do you know about this permit extension for this landfill in Alabama? If yes, has the landfill had any problems especially runoff into the Warrior River? Do you want to call Mr. Eastis?

Thank you.
Humberto

-----Original Message-----

From: David Eastis <<mailto:davideastis@gmail.com>>
Sent: Wednesday, February 14, 2018 11:53 AM
To: Ellington, Natalie <Ellington.Natalie@epa.gov>
Cc: David Eastis <davideastis@gmail.com>
Subject: Big Sky Environmental Landfill - AI

Ms Ellington, I am representing Bluff Creek Fishing and Hunting Association (non profit) on the Warrior River in Alabama. We have learned recently of the Big Sky Environmental (BSE) Landfill dumping black sewage sludge from out of state on a landfill in Adamsville, AL. Despite the united protests (stench, flies, feral pigs, spills) from residents near and around the landfill, Black Warrior River Keeper's (BWRK) contradiction of BSE's statements of compliance and monitoring, and BWRK's statements of ADEM not holding BSE compliant and enforcing reported lack of monitoring water runoff, spills, and NOVs, it appears ADEM is going ahead with their approval of extending their permit. This has the potential of devastating consequences for the Warrior River, a water source for Birmingham, Jefferson county, Walker county and surrounding areas.

Would you please call me at your earliest convenience.

Many thanks,

David Eastis
205-919-0711
davideastis@gmail.com

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From: [Guzman, Humberto](#)
To: [O'Lone, Dan](#)
Subject: RE: Big Sky Environmental Landfill - AI
Date: Tuesday, March 20, 2018 8:51:56 AM

Davy told me that he would talk to the complainant, Mr. Eastis. He was going to leave it to ADEM to take care of any issues.

From: O'Lone, Dan
Sent: Tuesday, March 20, 2018 7:26 AM
To: Guzman, Humberto <Guzman.Humberto@epa.gov>
Subject: Fwd: Big Sky Environmental Landfill - AI

I was looking for something else, but came across this. I thought I'd forward it since we were talking about the situation there.

Dan

Dan O'Lone, Acting Chief
NPEB permitting and
Enforcement Branch

Sent from my iPhone

Begin forwarded message:

From: "Guzman, Humberto" <Guzman.Humberto@epa.gov>
Date: February 28, 2018 at 13:26:49 EST
To: "O'Lone, Dan" <Olone.Dan@epa.gov>
Subject: FW: Big Sky Environmental Landfill - AI

-----Original Message-----

From: Zapata, Cesar
Sent: Tuesday, February 27, 2018 3:43 PM
To: Guzman, Humberto <Guzman.Humberto@epa.gov>
Subject: RE: Big Sky Environmental Landfill - AI

Thank you Humberto.

César A. Zapata
Deputy Director
Water Protection Division
United States Environmental Protection Agency, Region 4

-----Original Message-----

From: Guzman, Humberto
Sent: Tuesday, February 27, 2018 3:41 PM
To: Zapata, Cesar <Zapata.Cesar@epa.gov>
Subject: RE: Big Sky Environmental Landfill - AI

Cesar,

I sent this complaint to Larry Lamberth and Davy Simonson last week. It's about an expansion of a landfill and potential effects to water. I think that it is for RCRA.

H

-----Original Message-----

From: Zapata, Cesar
Sent: Tuesday, February 27, 2018 3:37 PM
To: Guzman, Humberto <Guzman.Humberto@epa.gov>; Horsey, Maurice <Horsey.Maurice@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>
Subject: FW: Big Sky Environmental Landfill - AI

FYI

-----Original Message-----

From: Torres, Ramon
Sent: Tuesday, February 27, 2018 3:15 PM
To: Zapata, Cesar <Zapata.Cesar@epa.gov>
Subject: Re: Big Sky Environmental Landfill - AI

Thanks Cesar,

I am working on it and I will let you know soon.

Take care,

Sent from my iPhone

On Feb 27, 2018, at 2:58 PM, Zapata, Cesar <Zapata.Cesar@epa.gov> wrote:

Ramon,

FYI, not sure if this has made it to RCRD. If it has, please let me know who is dealing with it to coordinate a response.

César A. Zapata
Deputy Director
Water Protection Division
United States Environmental Protection Agency, Region 4

-----Original Message-----

From: Thomas, Chris
Sent: Monday, February 26, 2018 8:11 AM
To: Zapata, Cesar <Zapata.Cesar@epa.gov>; Horsey, Maurice
<Horsey.Maurice@epa.gov>
Cc: Davis, Molly <Davis.Molly@epa.gov>; Ellington, Natalie
<Ellington.Natalie@epa.gov>
Subject: FW: Big Sky Environmental Landfill - AI

Fyi

-----Original Message-----

From: Ellington, Natalie
Sent: Thursday, February 22, 2018 2:34 PM
To: Davis, Molly <Davis.Molly@epa.gov>
Cc: Thomas, Chris <Thomas.Chris@epa.gov>
Subject: FW: Big Sky Environmental Landfill - AI

Molly,

As the Water Enforcement Branch Chief, this seems a request for your
(and/or your staff's) involvement.

Natalie

-----Original Message-----

From: David Eastis <mailto:davideastis@gmail.com>
Sent: Wednesday, February 14, 2018 11:53 AM
To: Ellington, Natalie <Ellington.Natalie@epa.gov>

Cc: David Eastis <davideastis@gmail.com>

Subject: Big Sky Environmental Landfill - Al

Ms Ellington, I am representing Bluff Creek Fishing and Hunting Association (non profit) on the Warrior River in Alabama. We have learned recently of the Big Sky Environmental (BSE) Landfill dumping black sewage sludge from out of state on a landfill in Adamsville, Al.

Despite the united protests (stench, flies, feral pigs, spills) from residents near and around the landfill, Black Warrior River Keeper's (BWRK) contradiction of BSE's statements of compliance and monitoring, and BWRK's statements of ADEM not holding BSE compliant and enforcing reported lack of monitoring water runoff, spills, and NOVs, it appears ADEM is going ahead with their approval of extending their permit. This has the potential of devastating consequences for the Warrior River, a water source for Birmingham, Jefferson county, Walker county and surrounding areas.

Would you please call me at your earliest convenience.

Many thanks,

David Eastis

205-919-0711

davideastis@gmail.com

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From: Guzman, Humberto
To: O'Lone, Dan
Subject: RE: Citizen complaint I sent you
Date: Monday, March 19, 2018 4:22:21 PM

Ok. I just left Ms. Thomas a voicemail. I spoke to Davy Simonson last week about this landfill. Davy told me that ADEM told the landfill to quit taking biosolids from the North. I didn't remember that it was the Big Sky Mtn. landfill. I told Ms. Thomas to send me more information. I told her to call the police or fire dept. if the odors were that bad. I didn't know at the time that I called her that it was a landfill. Maybe she'll call me back.

-----Original Message-----

From: O'Lone, Dan
Sent: Monday, March 19, 2018 4:17 PM
To: Guzman, Humberto <Guzman.Humberto@epa.gov>
Subject: Citizen complaint I sent you

Humberto, I sent you a vm from a citizen in AL. I now realize she is complaining about "foul odor from big sky mountain" which is the landfill that is receiving the Biosolids fro NY & NJ. Apparently they've holding train loads of it in a rail yard & the case was settled so Biosolids are heading to the landfill. Just wanted to fill you in on what I know.

Dan

Dan O'Lone, Chief
Stormwater and
Residuals Enforcement Section

Sent from my iPhone

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Garnett, Becky

From: Marraccini, Davina
Sent: Monday, April 23, 2018 1:44 PM
To: Garnett, Becky; Sampath, Sam
Cc: Simonson, Davy; O'Lone, Dan; Guzman, Humberto; Lincoln, Larry; Rodgers-Smith, Delores; Anderson, Meredith; Wise, Allison; Pinkney, James; McMillan, Laura; Davis, Molly
Subject: RE: Town of Parrish, AL
Attachments: Big Sky letter to ADEM 3_29_2018.pdf

Thanks again to everyone for your input on the response to Cong. Aldehort's office. Below is a copy of the final response I sent today:

Paul,

Your email was forwarded to my office in EPA Region 4 for response. We appreciate you forwarding the email from Mayor Hall expressing concerns about containers of biosolids on railcars that had been stranded at a rail yard in the Town of Parrish.

EPA understands that the last of the containers of biosolids were offloaded from the railcars and delivered to the Big Sky Environmental, LLC (Big Sky) landfill last week. As the Mayor notes, and per the attached letter on behalf of the Big Sky landfill to the Alabama Department of Environmental Management (ADEM), Big Sky will no longer accept biosolids originating from New York and New Jersey for disposal at their Adamsville landfill in response to concerns from the public and ADEM.

EPA was contacted by Mayor Hall in mid-March. Staff in the Resource Conservation and Restoration Division explained EPA's limited role in managing nonhazardous solid waste; explained that railroad transfer stations and rail yards are typically not state-regulated solid waste facilities; and suggested that the best entity to address potential health concerns would be the Alabama Department of Public Health (ADPH).

EPA shared the Mayor's concerns with ADEM's solid waste management program. ADEM confirmed they were aware of the situation and the Mayor's concerns, and confirmed that ADPH was aware too. EPA understands that in response to concerns, ADEM's water program responded and inspected the railcars in Parrish and found no leakage from the containers of biosolids.

With regard to other concerns raised in the Mayor's email, the Clean Water Act does require the written notice to the state permitting authority when biosolids are proposed to be landfilled in a different state from where it originated. There is no federal notification requirement for municipalities. Federal regulations do not limit the volume of biosolids that may be landfilled.

With respect to odors, these are generally considered a nuisance that are not typically quantified/quantifiable. Since railroad transfer stations and rail yards are not state-regulated solid waste management facilities, there is no permit with provisions that would address control of nuisance odors.

EPA will continue to monitor this situation and provide input when appropriate. If you have questions or need additional information from the EPA, please do not hesitate to contact me directly.

Davina Marraccini
 Public Affairs Specialist

U.S. EPA Region 4
404-562-8293 (office)
404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

*** Save trees! Please don't print this message unless necessary.

From: Garnett, Becky
Sent: Monday, April 23, 2018 9:15 AM
To: Marraccini, Davina <Marraccini.Davina@epa.gov>; Sampath, Sam <Sampath.Sam@epa.gov>
Cc: Simonson, Davy <Simonson.Davy@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Davis, Molly <Davis.Molly@epa.gov>
Subject: RE: Town of Parrish, AL

The letter looks good to me with Sam and Davy's distinctions. Thanks, all!

Becky
2-8083

From: Marraccini, Davina
Sent: Monday, April 23, 2018 9:11 AM
To: Sampath, Sam <Sampath.Sam@epa.gov>
Cc: Simonson, Davy <Simonson.Davy@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Garnett, Becky <Garnett.Becky@epa.gov>; Davis, Molly <Davis.Molly@epa.gov>
Subject: Re: Town of Parrish, AL

Yes, I will incorporate your suggestion in the final Sam.

Sent from my iPhone

On Apr 23, 2018, at 9:09 AM, Sampath, Sam <Sampath.Sam@epa.gov> wrote:

Davy/Davina,

I suggested to Davina last Friday to swap the yellow color highlighted words below to **landfilled**. This whole issue is related to landfill not land application that involves class A biosolids and the rest of the sentences still hold good meeting 503Regs.

Hope you agree with me.

Thanks
Sam
678-770-6180c

From: Simonson, Davy

Sent: Monday, April 23, 2018 8:55 AM

To: Marraccini, Davina <Marraccini.Davina@epa.gov>

Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Garnett, Becky <Garnett.Becky@epa.gov>; Sampath, Sam <Sampath.Sam@epa.gov>; Davis, Molly <Davis.Molly@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>

Subject: RE: Town of Parrish, AL

Importance: High

Hi Davina. Here are my recommendations. Additions are in red below. Some deletions have been made, also (and may not be indicated as would be the case using track changes). Please note I did not use the revised version that water sent to you, so their edits are not included below.

1st, 2nd, & 4th paragraphs: I suggest removing: "railcars containing biosolids" and, "biosolids contained in the railcars". These terms indicate EPA thinks that the biosolids were in boxcars or in covered open-top railcars, rather than in containers (ready for offloading and transport to the MSWLF) **sitting atop** flatbed-type railcars. I've added short, yet more-accurate language to the response.

3rd paragraph: I have removed: "including biosolids, as defined under the Resource Conservation and Recovery Act". This is not necessarily accurate. As we discussed Friday, biosolids are regulated under part 503 of the CWA. In my initial edits, I attempted to define the word "nonhazardous" from a RCRA point of view (i.e., making sure to differentiate it from RCRA subtitle C hazardous waste). The Mayor's correspondence repeatedly refers to biosolids as a "material". Upon disposal, the biosolids are a waste (and no longer a "material" that can be land applied, composted, etc.). In the context of a MSWLF accepting biosolids, some states may refer to it as a "special waste". But, nonetheless, it is a waste and not a material upon disposal. Bottom line, I believe that "nonhazardous solid waste" as written below should suffice. That is what I explained to the Mayor during our phone call (i.e., from a RCRA viewpoint). I did not attempt to speak on biosolids in great detail during our conversation.

6th paragraph (odors as a nuisance): I edited this paragraph significantly. Please call me if you wish to discuss. Thanks.

Davy (202-510-0392)

From: Marraccini, Davina

Sent: Friday, April 20, 2018 1:57 PM

To: Simonson, Davy <Simonson.Davy@epa.gov>

Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Garnett, Becky <Garnett.Becky@epa.gov>; Sampath, Sam <Sampath.Sam@epa.gov>; Davis, Molly <Davis.Molly@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>

Subject: RE: Town of Parrish, AL

Thanks to everyone who has provided input thus far. Please see the updated/edited version of the email below, and let me know of any needed changes for accuracy ASAP. I realize it's late in the day on a Friday, but would love to get back to the Cong. today if at all possible.

Paul,

Thank you for forwarding the email from Mayor Hall expressing concerns about contained biosolids on railcars that had been stranded at a rail yard in the Town of Parrish.

As the Mayor notes, and per the attached letter on behalf of the Big Sky Environmental, LLC (Big Sky) landfill to the Alabama Department of Environmental Management (ADEM), EPA understands that the last of the containers of biosolids were offloaded from the railcars and delivered to the Big Sky facility earlier this week [Note: this would now be "last week"]. The letter also notes that, in response to concerns from the public and ADEM, Big Sky will no longer accept biosolids originating from New York and New Jersey for disposal or land application at their Adamsville landfill facility.

EPA was contacted by Mayor Hall in mid-March. Staff in the Resource Conservation and Restoration Division explained EPA's limited role in managing nonhazardous solid waste; explained that railroad transfer stations and rail yards are typically not state-regulated solid waste facilities; and suggested that the best entity to address potential health concerns would be the Alabama Department of Public Health (ADPH).

EPA shared the Mayor's concerns with ADEM's solid waste management program. ADEM confirmed they were aware of the situation and the Mayor's concerns, and confirmed that ADPH was aware, too. EPA understands that in response to concerns, ADEM's water program responded and inspected the railcars in Parrish and found no leakage from the contained biosolids.

With regard to other concerns raised in the Mayor's email, the Clean Water Act does require the written notice to the state permitting authority when biosolids are proposed to be applied to land in a different state from where it originated. There is no federal notification requirement for municipalities. Federal regulations do not limit the volume of biosolids that may be land applied.

With respect to odors, these are generally considered a nuisance that are not typically quantified/quantifiable. Moreover, since railroad transfer stations and rail yards are not state-regulated solid waste management facilities, there is no permit with provisions that would address control of nuisance odors.

EPA will continue to monitor this situation and provide input when appropriate. If you have questions or need additional information from the EPA, please do not hesitate to contact me directly.

Davina Marraccini
Public Affairs Specialist
U.S. EPA Region 4
404-562-8293 (office)
404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

*** Save trees! Please don't print this message unless necessary.

From: Simonson, Davy
Sent: Friday, April 20, 2018 10:28 AM

To: Marraccini, Davina <Marraccini.Davina@epa.gov>

Cc: O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>; Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>; McMillan, Laura <McMillan.Laura@epa.gov>; Simonson, Davy <Simonson.Davy@epa.gov>

Subject: RE: Town of Parrish, AL

Hi Davina.

I cut and pasted the Mayor's correspondence sent to Congressman Aderholt's field office, along with your straw response email to Paul Housel, into the attached Word document. My suggestions for your draft response email, as well as some pertinent notes, are in Track Changes.

-Davy

From: Marraccini, Davina

Sent: Thursday, April 19, 2018 1:05 PM

To: Simonson, Davy <Simonson.Davy@epa.gov>; O'Lone, Dan <Olone.Dan@epa.gov>; Guzman, Humberto <Guzman.Humberto@epa.gov>

Cc: Lincoln, Larry <Lincoln.Larry@epa.gov>; Rodgers-Smith, Delores <Rodgers-Smith.Delores@epa.gov>; Anderson, Meredith <Anderson.Meredith@epa.gov>; Wise, Allison <Wise.Allison@epa.gov>; Pinkney, James <Pinkney.James@epa.gov>

Subject: FW: Town of Parrish, AL

All,

Please see the straw response to the Congressman's representative about the Mayor's email. I highlighted areas where I need input from either WPD or RCRA. Please send your suggestions NLT 10 am tomorrow, if possible.

DRAFT EMAIL RESPONSE:

Paul,

Thank you for forwarding the email from Mayor Hall expressing concerns about railcars containing biosolids that had been stranded in the Town of Parrish.

As the Mayor notes, and per the attached letter on behalf of Big Sky Environmental, LLC (Big Sky) to the Alabama Department of Environmental Management (ADEM), EPA understands that the biosolids contained in the railcars are in the process of being delivered to the Big Sky facility. According to the letter, the transfer is expected to be completed by May 28. [Can we confirm with ADEM what the status is and add a sentence to reflect how many rail cars have been moved?] The letter also notes that, in response to concerns from the public and ADEM, Big Sky will no longer accept biosolids originating from New York and New Jersey for disposal or land application at their Adamsville facility.

EPA was contacted by Mayor Hall in mid-March, prior to learning about Big Sky's aforementioned decisions. Staff in the Resource Conservation and Recovery Program explained EPA and ADEM's limited role. [Add language expressing what our role is from both the RCRA and water sides. Are there existing federal and/or state rules regarding where and how much of this material can be off loaded? Can we confirm this is a "non-hazardous" material and that EPA has little to no concerns? If not, what is our message? Are we aware of any notification requirements at the federal/state/local levels when the

biosolids are transported into a municipality? Was EPA the source of the statement referenced by the Mayor that "we cannot measure odor"? If so can we expand upon that?]

In her email, Mayor Hall notes Big Sky Environmental is hoping to bring more material into Parrish location as a disbursement center. [Can we contact ADEM to confirm this? If true, does EPA and/or ADEM have any role?]

Lastly, the health-related concerns Mayor Hall cites, including breathing issues, would be more appropriately addressed by XX.

EPA will continue to monitor this situation and provide input when appropriate. If you have questions or need additional information from the EPA, please do not hesitate to contact me directly.

Davina Marraccini
Public Affairs Specialist
U.S. EPA Region 4
404-562-8293 (office)
404-387-4368 (cell)
404-562-8335 (fax)
marraccini.davina@epa.gov

*** Save trees! Please don't print this message unless necessary.

Begin forwarded message:

From: "Skane, Elizabeth" <Skane.Elizabeth@epa.gov>
Date: April 16, 2018 at 4:06:42 PM EDT
To: "Marraccini, Davina" <Marraccini.Davina@epa.gov>
Cc: "Levine, Carolyn" <Levine.Carolyn@epa.gov>
Subject: FW: Town of Parrish, AL

Hi Davina, we got the inquiry below from Cong. Aderholt's Jasper, AL District Field Director. Would you be so kind as to follow up directly with the staffer at your earliest convenience? Many thanks!

Cc Carolyn for OLEM awareness

Best,
Elizabeth

Elizabeth Skane ♦ 202.564.5696
US Environmental Protection Agency
Office of Congressional Affairs
WJC North 34435

From: Eades, Cassaundra On Behalf Of OCIRmail
Sent: Monday, April 16, 2018 2:58 PM
To: Skane, Elizabeth <Skane.Elizabeth@epa.gov>; Borum, Denis <Borum.Denis@epa.gov>; Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>
Subject: FW: Town of Parrish, AL

From: Housel, Paul [<mailto:Paul.Housel@mail.house.gov>]
Sent: Thursday, March 01, 2018 12:05 PM
To: OCIRmail <OCIRmail@epa.gov>
Subject: Town of Parrish, AL

We received the following email from the Mayor of Parrish. Any direction or assistance you can provide will be greatly appreciated.

I would like to try to explain the situation we are facing here in Parrish. Unbeknownst to anyone in the Town of Parrish, including the mayor's office, containers of Bio-solids (also known as sewer sludge) started arriving at the Norfolk Southern rail yard sometime at the end of January. Currently there are 42 train cars, each has 6 containers, each container holds 20 tons of material (or 40,000 pounds) of material. So there is approximately 10,080,000 pounds of human waste, bio-solids, or sewage sludge here in Parrish. Yes you read that correctly 10 million pounds.

My understanding is this is a non-hazardous material. And the EPA and ADEM have little to no concerns about this material. So even though there is such a large amount they are not offering any help to the Town of Parrish. I understand that this material may not be harmful to the environment. But what about the quality of life of the people of Parrish? The odor/stench off of this material is horrendous. I am not for hyperbole, so please understand that I am not exaggerating when I tell you at times it smells as if there are rotting carcasses all over the town of Parrish. This is not an everyday occurrence....but it has happened 3 days in the last week. This stench is also not just a "whiff" or light smell. The stench is overpowering and nauseating. It is causing the residents of Parrish to barricade inside. They can not go outside to sit on their porch, or work in their yards. The fumes permeate the entire town!

Next door to the Rail yard is where Parrish Park and Rec play baseball and softball. Children are being subjected to this stench! Our Spring Festival will be held at the old Parrish High School and it is adjacent to the Rail Road. The Ultimate Fair will be here in July. Can you imagine the problem if the temperatures are in the 90's? It will be a nightmare for the people of Parrish.

The Town of Parrish has been thrust into an unfair and uninvited situation. We have large corporations shipping this waste material into municipalities and very little can be done to fight it. Most rural towns like Parrish do not have zoning laws and regulations (something I am hoping to fix). Incredibly, this material can be shipped into a municipality and not a word needs to be said to any municipal official. These are things that need to change.

Smaller towns do not have the funds to fight these legal battles, and I believe that is one reason this happens. I hope that someone in

Washington DC is listening and can truly understand the situation that I am facing. My question is this....is not the quality of life for the Town of Parrish just as important as Birmingham? Tuscaloosa? This material should not be allowed to enter any municipal district! The size of the town should not matter. And their ability to pay an attorney to fight the situation should not be the determining factor as to whether this type of material should be allowed to stay inside a town's boundaries!

You would think that this is common sense. However, I have had little to no help from ADEM, Health officials, or the EPA. We have people in Parrish who are having difficulty breathing due to the noxious fumes this material is putting off and I can get no help from these offices. I was told that "we can't measure odor". A person with respiratory issues can have a problem with their breathing when there are noxious fumes or even perfume in the air! I have several people complaining of breathing issues, but still we are receiving no help from the agencies that are supposed to be protecting the citizens.

I am hoping that the situation here in Parrish will shed light on this problem. I would like to see new guidelines in regards to where and how much of this material can be off loaded. It should never be allowed to be off loaded in a populated area. It is a health hazard and an incredible nuisance. I just can not stress to you enough how detrimentally this has affected the quality of life for the residents of Parrish.

As an update....the containers have finally been given approval to be transferred to Adamsville. However, Big Sky Environmental is hoping to bring more material into Parrish and use our location as a dispersment center. We will be fighting that.

Thank you for your time,
Heather Hall
Mayor
Town of Parrish

Paul Housel
District Field Director
Office of Congressman Robert Aderholt
1710 Alabama Avenue, Room 247
Jasper, AL 35501
Phone: 205-221-2310
Fax: 205-221-9035



March 29, 2018

Alabama Department of
Environmental Management
Post Office Box 301463
Montgomery, Alabama 36130-1463

VIA UNITED PARCEL SERVICE

Attention: Mr. Eric Sanderson, Chief
Solid Waste Branch

RE: Response to Request for Additional Information
Renewal of Solid Waste Disposal Permit 37-48
Big Sky Environmental, LLC, Solid Waste Facility
Adamsville, Jefferson County, Alabama

Dear Mr. Sanderson:

On behalf of Big Sky Environmental, LLC (Big Sky), Highland Technical Services, Inc. (HTSI) is submitting this response to the request for additional information dated March 15, 2018, submitted by the Alabama Department of Environmental Management (ADEM) to Big Sky, to assist in renewal of the facility's Solid Waste Disposal Permit Number 37-48. The ADEM requests are shown below in italics with the Big Sky responses immediately following each request.

REQUEST: *Due to recent mining activities conducted at the site, the Department has requested that the facility's stormwater management plan be updated to include the design and narrative of the landfill's run-off control system in accordance with ADEM Admin. Code r. 335-13-4-.17(2) and (3). This includes volume calculations for a 24-hour, 25-year storm event. Additionally, an updated facility map which includes at a minimum: the permitted disposal area, biosolids handling area, biosolids land application and disposal area(s), stormwater flow directions, and control structures for a 24-hour, 25-year storm event is requested.*

RESPONSE: Neither the stormwater management system design nor the means of achieving compliance with the requirements of ADEM Admin, Code r. 335-13-4-.17(2) or (3) has changed due to the referenced mining activities. The pending permit renewal application proposes to adhere to the same stormwater management plan and design, as prepared by CDG Engineers and submitted by Construction Management Services, LLC in April 2005 and revised in September 2006. This plan and design were previously approved by the Department for the permit renewal on September 21, 2012, and for the initial permit issuance approved on August 6, 2007. Despite the presence of mining activities, as stated in the pending permit renewal application, the landfill operations would remain in Phase I of the overall design, i.e. a combined disposal area of 161.24 acres (66.24 acres MSW and 95 acres C/D) out of the total facility size of 1,522.7 acres. As such, the stormwater retention basin system designed by CDG Engineers would be sufficient to meet the required 24-hour, 25-year storm event, as reflected in Section 5.6 and Appendix 5.1 of the September 2006 permit application. Moreover, it should be noted that, as designed, the stormwater basins each include an additional two feet so as to ensure sufficient capacity for larger volumes than those resulting from the 24-hour, 25-year storm event.

Highland Technical Services, Inc.
528 Mineral Trace
Hoover, Alabama 35244

Rowe Engineering & Surveying, Inc.
3502 Laughlin Drive, Suite B
Mobile, Alabama 36693

HTSI

However, based on previous discussions with the Department, Big Sky Environmental, LLC has filed an electronic Notice of Intent (eNOI) to re-locate the permitted outfall under their general NPDES permit, so as to sample landfill related stormwater discharge prior to its confluence with runoff from the mining operations. This request is currently pending with the ADEM Water Division.

REQUEST: *The Department has requested that a comprehensive nutrient management plan be submitted which includes details as to how the biosolids are managed at the facility in accordance with EPA's Part 503B Biosolids Program. The Department has also requested a detailed description of the biosolids handling process from receipt of the biosolids to landfill disposal and/or land application.*

RESPONSE: Due to concerns expressed by the public and the ADEM, Big Sky will no longer accept biosolids, originating in the States of New York and New Jersey, for disposal and/or land application at the Big Sky Adamsville facility. As such, Big Sky is of the opinion that a nutrient management plan will no longer be required.


As you are aware, the biosolids are delivered to the local area by rail and loaded to trucks for delivery to the Big Sky facility. It is our understanding that approximately 44 rail cars remain at one or more rail spurs in Jefferson and Walker Counties. Once the contents of the remaining rail cars are delivered to the Big Sky facility, no additional biosolids will be delivered via rail to the Big Sky Adamsville facility. The remaining biosolids will be disposed of in the active lined cell of the landfill under the following ADEM Waste Profile numbers:

| | |
|--------|--------|
| 160917 | 162134 |
| 161604 | 161538 |
| 161539 | 161534 |
| 162046 | 161530 |
| 162086 | 162135 |
| 161532 | |

Big Sky anticipates that the transportation and disposal of the remaining biosolids will require approximately 60 days to complete. Within 10 days following disposal of the final load of waste, Big Sky will notify the ADEM to terminate the waste approvals associated with the above-referenced Waste Profiles.

Highland Technical Services, Inc. and Big Sky Environmental, LLC hope that this response will assist the ADEM with the renewal of the facility's Solid Waste Disposal Permit. If you have any questions concerning this submittal or require any additional information, please contact our office at (205) 985-4874.

Sincerely,
HIGHLAND TECHNICAL SERVICES, INC.


William W. Cooch, P.G.
Principal Geologist

cc: Johnathon Click, VP of Operations

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Garnett, Becky

From: Sanderson, Eric <ELS@adem.alabama.gov>
Sent: Wednesday, October 17, 2018 10:45 AM
To: Garnett, Becky
Cc: Story, S Scott; Cobb, Steve; Dean, Glenda; Lutz, Daphne Y
Subject: Alabama - EPA Biosolids Application Review Request - Wistar Property - Walker County
Attachments: BURTON LAND APP PLAN-rev2.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Becky,

Attached is the Biosolids Land Application Plan for the Wistar Property in Walker County Alabama. Per our discussions, ADEM has received complaints regarding this site and we request EPA conduct a review of the attached plan to ensure it is consistent with the EPA Biosolids regulations. We appreciate any feedback the EPA can provide. Please call me at 334-271-7755 when you have an opportunity to discuss.

Thanks

Eric

Eric Sanderson, P.E.
Chief, Solid Waste Branch
Land Division
Alabama Department of Environmental Management
1400 Coliseum Boulevard
Montgomery, AL 36110-2059

(334) 271-7755
els@adem.alabama.gov

1.00

SITE SPECIFIC LAND APPLICATION PLAN FOR Burton Properties

This Plan is a component of Big Sky Environmental, LLC Best Management and Practices Plan for Land Applications

Material Stockpile Location:

| | |
|---|---|
| Site Address: (General Location) | 701 Wistar Road Parrish AL 35580 |
| GPS Coordinates of Stockpile and Compost Site Entrance: | Lat 33° 47' 46.40" N Long 87° 16' 29.01" W |
| County and State: | Walker County, Alabama |

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Introduction:

This introduction is intended to give the reviewer a quick and general overview of this site and related items. Many elements of this introduction are more completely addressed later in this One-Time Site Specific Land Application Plan.

The goals of this plan include the following:

- Establish procedures to best manage the one-time storage and land application practices of biosolids on the listed site.
- Ensure that consistent and uniform land application practices are performed and observed.
- Establishing and providing improved site soil characteristics through monitoring and practicing best methods for one-time land application.
- Establish procedures to meet the beneficial use of biosolids as defined in EPA part 503 Biosolids Rule.

The Stockpile and composting area hereafter referred to as The Wistar Property is currently a closed and reclaimed surface mine site. The land in this Land Application Plan in its entirety is owned by Dan Burton. The stockpile area is an upland site with rolling hills. The soil and nutrient deprived landscape that covers the majority of the property currently offers spotty vegetation from grasses planted by mine reclamation contractors. Steep hillsides border the property with timber on the southern boundary. The city of Jasper, Alabama's Waste Water Treatment Plant neighbors the property on the northern boundary. The closest residence to the stockpile and composting operation is 2,800 ft. in distance from the stockpile area.

Leaseholder Arrangements:

Original Arrangement:

Dan Burton owns and manages all of the properties described in this plan. Big Sky Environmental, LLC has established a lease agreement for use of the property for and rail spur to fulfill the operations of offloading and stockpiling materials for the compost and land application processes. Big Sky Environmental, LLC is in contract to receive the materials to be shipped to the Wistar Property via the Norfolk Southern Railroad, Burton Industries is paid in the lease agreement for usage of the land for rail access, composting and land application. Burton Industries will staff the land application operations and monitoring, while

Big Sky Environmental will staff transport of material to the stockpile and compost area.

New Arrangement:

In efforts to ease public complaints, Norfolk Southern Railroad has refused to offer rail service to the Burton Property which in turn caused contractual terminations for Big Sky to receive Biosolids from NY and NJ shipper.

General Site Description:

The properties owned by Dan Burton that will be utilized in this plan consists of 2 types. Some are rocky landscaped with spotty grass reclaimed strip mine properties and the remaining are nutrient deprived grassed fields. The Wistar Property consists of dry, rocky rolling hills that consists of spotty grass fields and mixture of pine and hardwood forests on steeper land. Both Property types will be approached with its own method of land application and use. These differentiated land types and methods for land application and monitoring will be described in this plan.

1.0 Land History and Usage:

The land to be used for land application has been strip mined for coal and used for coal and clay material stock pile and loading. The mining commission has released the portions to be used for land application and have been notified of the intended land application. Portions of the included property in this plan have received septage from the city of Jasper WWTP and some have had biosolids land applied in years past.

2.0 Stabilization Method:

Before the Biosolids Stockpile at the Wistar property is land applied, it will be reintroduced to lime to eliminate any leftover pathogens and ensure positive results in spreading. The mixing process will take place with a toothed bucket skid steer loader using an approximate measure of 1part biosolid to 0.25part lime powder. The mixture will be stockpiled to the side of the original stockpile and samples will be monitored to ensure PH levels reach EPA Part 503 Rule of 12+ for at least 72 hours.

Material in the stabilized stockpiles will remain covered with a weatherproof tarp or sheltered under a temporary structure until its land application begins.

3.0 Methods of Application:

Burton Industries has a wide variety of application equipment and methods for field applying biosolids. Some of the equipment is very specialized and others are more common in typical agricultural production. Under normal conditions, the preferred method of land application is the use of rear or side discharge spreaders however; land application of biosolids will be conducted with equipment that is suitable for the site and also for the material being land applied. Land application methods will provide for an even and consistent distribution in accordance with the calculated application rate. Quality management of biosolids requires the flexibility to adjust to various site conditions.

Equipment that may be used includes:

- Rear- and side-discharge manure spreaders for dewatered biosolids.
- Bulldozers, Excavators Wheel Loaders.
- Farm tractor with various implements such as a disc harrow.
- Other equipment as necessary.

Land applications at the listed sites are limited to site conditions. It is proposed that there be no limitations on daily timing of applications or restrictions for holidays. From a practical standpoint, the one-time land application will take place during normal daylight hours and completed when the material that is stockpiled runs out. It is estimated that once material is mixed with lime and PH levels remain constant 12+ for 72 hours, within 2-3 work days the application for the stabilized material will be completed.

Big Sky Environmental and Burton Industries will consider requests from neighbors if biosolids application procedures pose a likelihood of conflicting with planned activities. There are no known special events in this area that biosolids activities could impact.

Recreational use of this site is limited to private events at the property owner's discretion.

4.0 General Biosolids Transportation:

This will be a one-time application of stocked biosolids already stored on the property, therefore the transport of biosolids materials from the compost and stockpile area will not require any public roadway transportation.

5.0 Best Management and Practices Plan for Stabilizing, Stockpiling and Applying biosolids:

- Materials must be handled by machinery and vehicles that are appropriate for the type of materials being handled.
- Field stockpiles shall not be in drainage ways or in wetlands. They should be placed on fairly level land. Stockpiles should be situated near the top of slopes to minimize exposure to up-slope runoff. An earthen containment berm may be advisable if the facility is located fairly close to a drainage-way, surface waters, or other sensitive feature.
- Materials should be stored in areas with adequate buffers, preferably with a buffer of vegetation. Buffers for stockpiling materials shall be no less than 100' from any neighboring property lines. Buffers for stockpiling materials shall be a minimum of 100' from any waterway or established body of water.
- Stabilized materials may be stockpiled to commence land applications once enough material is accumulated but not to exceed the potential to land apply all materials stockpiled in a 2-week period.
- Inspect for odors and conditions conducive to odors; apply chemicals or surface covering material to suppress odors if needed; consider the meteorological conditions and the potential for off-site odors when scheduling opening the storage pile
- Train employees to use appropriate sanitation practices; inspect for compliance
- Clean all vehicles and equipment before they exit onto public roads
- Where applicable, use temporary fencing to exclude livestock from the stockpile area; install signs; secure site appropriately
- Inspect buffer zones to ensure run-off is not moving out of bounds
- Inspect and maintain up-slope water diversions
- Minimize ponding and storage time to the extent feasible during hot, humid weather; manage accumulated water appropriately
- Use biosolids that stay consolidated and non-flowing; shape stockpiles whenever possible to shed water
- Designate a competent public relations person; maintain communication with stakeholders; notify agencies of reportable incidents; explain actions taken to respond to citizens' concerns or complaints
- Install signs and implement security measures to restrict public access
- Train employees to properly operate the site according to plan

- Attend to site aesthetics
- Access to the site entrances will be through a locked gate and will be restricted by informational signs. New employees to the sites are walked through these procedures described in this plan.

6.0 Calculating the Application Rate:

As this will be a One-time land application process and no future materials are being delivered. It is calculated that an approximate 1,100 tons of material will be land applied after stabilization to the Wistar Rd Property consisting of +600 acres. The application rate per acre shall not exceed 6 tons per acre.

7.0 Verifying the Application Rate:

When applying biosolids, application rates are calculated in tons per acre. Depending on which machine and applicator that is being used, the correct area will be covered by varying speed and width of spread. The typical application rate procedure works like this: the supervisor determines application area, rate and maximum number of loads for a field. This is entered on the "Application Report" and the report is given to the operator.

8.0 Pathogen Reduction:

The stabilized biosolids will have proven to pass EPA part 503 rule for pathogen reduction after monitoring PH levels to remain a constant +12 for at least 72 hours.

9.0 Trace Elements:

At a minimum, biosolids land applied at the site, must meet the Ceiling Concentration Limits for pollutants found in Table 1 of WAC 173-308-170 (1). It is a policy of Big Sky Environment to only accept biosolids that meet the Pollutant Concentration Limit found in Table 3 of WAC 173-308-170 (3).

10.0 Vector Attraction Reduction Standard:

Biosolids that accepted for stockpiling at the Wistar Property, have met vector attraction prior to shipment through processing at the generating facility or has physical properties such as high pH that reduces vector attraction.

11.0 Restricting Site Access

Signage will be placed at all normal points of access. Signs will also be placed at other points along the boundary where it is deemed appropriate by the property owner or Big Sky Environmental or as requested by proper authority.

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ETT Scores Tracker

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| (For most states, this includes data through June 30, 2018.) | |

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ETT Scores Tracker

| Database: Oct 2018 SDWIS/FED Freeze | | | | | | | | | | | | | | |
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| (For most states, this includes data through June 30, 2018.) | | | | | | | | | | | | | | |
| PWSID | PWS Name | PWS Type | Pop Srvd | First Reported Date to SDWIS | ETT Scores | | | | | | | | | |
| | | | | | Oct-18 | Jul-18 | Apr-18 | Jan-18 | Oct-17 | Jul-17 | Apr-17 | Jan-17 | Oct-16 | Jul-16 |
| FL2124416 | ORCHARD COMMUNITY CHURCH WTP | NTNCWS | 200 | 11/23/16 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| FL2124418 | CAL-MAINE FOODS, INC. | NTNCWS | 85 | 8/16/18 | 0 | | | | | | | | | |
| FL2164655 | DYNAREX WAREHOUSE WTP | NTNCWS | 45 | 11/30/17 | 0 | 0 | 0 | 0 | | | | | | |
| FL2244152 | CORINTH CHRISTIAN ACADEMY | NTNCWS | 98 | 11/30/17 | 0 | 0 | 0 | 0 | | | | | | |
| FL2454378 | DAYSRING SENIOR LIVING | CWS | 64 | 11/23/16 | 0 | 2 | 0 | 1 | 1 | 0 | 0 | 0 | | |
| FL2614267 | SUWANNEE VALLEY ELECTRIC COOPERATIVE | NTNCWS | 82 | 11/30/17 | 0 | 0 | 0 | 0 | | | | | | |
| FL2614268 | SUWANNEE CORRECTIONAL INSTITUTE | CWS | 4950 | 2/21/18 | 0 | 0 | 0 | | | | | | | |
| FL2624186 | BOYS ; GIRLS CLUB WTP | NTNCWS | 50 | 3/10/17 | 0 | 2 | 3 | 2 | 1 | 0 | 0 | | | |
| FL3425165 | MENDING FENCES REHABILITATION CENTER | NTNCWS | 30 | 5/18/16 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 |
| FL3425174 | AVL SYSTEMS INC. | NTNCWS | 26 | 8/16/18 | 0 | | | | | | | | | |
| FL3594241 | OVIEDO MARKETPLACE (CONSEC.) | CWS | 689 | 5/18/16 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 |
| FL3600007 | VILLAGE OF PINE RIDGE (CONSEC) | CWS | 4075 | 5/26/17 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| FL4434574 | PALM CITY FARMS PRODUCE | NTNCWS | 25 | 8/16/18 | 0 | | | | | | | | | |
| FL4505014 | SEM CHI/SUGAR FARMS | NTNCWS | 120 | 3/10/17 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| FL5084116 | TOWN AND COUNTRY UTILITY | CWS | 25 | 3/10/17 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| FL6095093 | DUKE ENERGY COMBINED CYCLE WTP | NTNCWS | 58 | 8/16/18 | 0 | | | | | | | | | |
| FL6296388 | ALBRITTON LABOR CAMP | NTNCWS | 76 | 11/16/15 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| FL6296389 | SHERWOOD MHP WEST | CWS | 45 | 2/22/16 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| FL6296396 | BAYAAN ACADEMY | NTNCWS | 44 | 9/1/17 | 0 | 0 | 0 | 0 | 0 | | | | | |
| FL6296400 | TAMPA GENERAL HOSPITAL | NTNCWS | 3700 | 11/30/17 | 0 | 0 | 0 | 0 | | | | | | |
| FL6412551 | HARBOUR ISLES MASTER ASSOCIATION | CWS | 200 | 3/10/17 | 1 | 1 | 0 | 0 | 0 | 0 | 0 | | | |
| FL6535744 | BORAL ROOFING 2 | NTNCWS | 25 | 8/16/18 | 1 | | | | | | | | | |
| FL6535748 | MULBERRY RAILCAR | NTNCWS | 30 | 5/18/18 | 0 | 0 | | | | | | | | |

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| Database: Oct 2018 SDWIS/FED Freeze | | | | | | | | | | | | | |
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| (For most states, this includes data through June 30, 2018.) | | | | | | | | | | | | | |
| PWSID | PWS Name | PWS Type | Pop Srvd | First Reported Date to SDWIS | ETT Scores | | | | | | | | |
| | | | | | Oct-18 | Jul-18 | Apr-18 | Jan-18 | Oct-17 | Jul-17 | Apr-17 | Jan-17 | Oct-16 |
| FL2124416 | ORCHARD COMMUNITY CHURCH WTP | NTNCWS | 200 | 11/23/16 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| FL2124418 | CAL-MAINE FOODS, INC. | NTNCWS | 85 | 8/16/18 | 0 | | | | | | | | |
| FL2164655 | DYNAREX WAREHOUSE WTP | NTNCWS | 45 | 11/30/17 | 0 | 0 | 0 | 0 | | | | | |
| FL2244152 | CORINTH CHRISTIAN ACADEMY | NTNCWS | 98 | 11/30/17 | 0 | 0 | 0 | 0 | | | | | |
| FL2454378 | DAYSRING SENIOR LIVING | CWS | 64 | 11/23/16 | 0 | 2 | 0 | 1 | 1 | 0 | 0 | 0 | |
| FL2614267 | SUWANNEE VALLEY ELECTRIC COOPERATIVE | NTNCWS | 82 | 11/30/17 | 0 | 0 | 0 | 0 | | | | | |
| FL2614268 | SUWANNEE CORRECTIONAL INSTITUTE | CWS | 4950 | 2/21/18 | 0 | 0 | 0 | | | | | | |
| FL2624186 | BOYS ; GIRLS CLUB WTP | NTNCWS | 50 | 3/10/17 | 0 | 2 | 3 | 2 | 1 | 0 | 0 | | |
| FL3425165 | MENDING FENCES REHABILITATION CENTER | NTNCWS | 30 | 5/18/16 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 |
| FL3425174 | AVL SYSTEMS INC. | NTNCWS | 26 | 8/16/18 | 0 | | | | | | | | |
| FL3594241 | OVEDO MARKETPLACE (CONSEC.) | CWS | 689 | 5/18/16 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 |
| FL3600007 | VILLAGE OF PINE RIDGE (CONSEC) | CWS | 4075 | 5/26/17 | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| FL4434574 | PALM CITY FARMS PRODUCE | NTNCWS | 25 | 8/16/18 | 0 | | | | | | | | |
| FL4505014 | SEM CHI/SUGAR FARMS | NTNCWS | 120 | 3/10/17 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | | |
| FL5084116 | TOWN AND COUNTRY UTILITY | CWS | 25 | 3/10/17 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | |
| FL6095093 | DUKE ENERGY COMBINED CYCLE WTP | NTNCWS | 58 | 8/16/18 | 0 | | | | | | | | |
| FL6296388 | ALBRITTON LABOR CAMP | NTNCWS | 76 | 11/16/15 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| FL6296389 | SHERWOOD MHP WEST | CWS | 45 | 2/22/16 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| FL6296396 | BAYAAN ACADEMY | NTNCWS | 44 | 9/1/17 | 0 | 0 | 0 | 0 | 0 | | | | |
| FL6296400 | TAMPA GENERAL HOSPITAL | NTNCWS | 3700 | 11/30/17 | 0 | 0 | 0 | 0 | | | | | |
| FL6412551 | HARBOR ISLES MASTER ASSOCIATION | CWS | 200 | 3/10/17 | 1 | 1 | 0 | 0 | 0 | 0 | 0 | | |
| FL6535744 | BORAL ROOFING 2 | NTNCWS | 25 | 8/16/18 | 1 | | | | | | | | |
| FL6535748 | MULBERRY RAILCAR | NTNCWS | 30 | 5/18/18 | 0 | 0 | | | | | | | |

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ETT Scores Tracker

| Database: Oct 2018 SDWIS/FED Freeze | | | | | | | | | | | | | | |
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| | | | | | Oct-18 | Jul-18 | Apr-18 | Jan-18 | Oct-17 | Jul-17 | Apr-17 | Jan-17 | Oct-16 | Jul-16 |
| FL2124416 | ORCHARD COMMUNITY CHURCH WTP | NTNCWS | 200 | 11/23/16 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | Apr-16 |
| FL2124418 | CAL-MAINE FOODS, INC. | NTNCWS | 85 | 8/16/18 | 0 | | | | | | | | | |
| FL2164655 | DYNAREX WAREHOUSE WTP | NTNCWS | 45 | 11/30/17 | 0 | 0 | 0 | 0 | | | | | | |
| FL2244152 | CORINTH CHRISTIAN ACADEMY | NTNCWS | 98 | 11/30/17 | 0 | 0 | 0 | 0 | | | | | | |
| FL2454378 | DAYS PRING SENIOR LIVING | CWS | 64 | 11/23/16 | 0 | 2 | 0 | 1 | 1 | 0 | 0 | 0 | | |
| FL2614267 | SUWANNEE VALLEY ELECTRIC COOPERATIVE | NTNCWS | 82 | 11/30/17 | 0 | 0 | 0 | 0 | | | | | | |
| FL2614268 | SUWANNEE CORRECTIONAL INSTITUTE | CWS | 4950 | 2/21/18 | 0 | 0 | 0 | | | | | | | |
| FL2624186 | BOYS ; GIRLS CLUB WTP | NTNCWS | 50 | 3/10/17 | 0 | 2 | 3 | 2 | 1 | 0 | 0 | | | |
| FL3425165 | MENDING FENCES REHABILITATION CENTER | NTNCWS | 30 | 5/18/16 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 |
| FL3425174 | AVL SYSTEMS INC. | NTNCWS | 26 | 8/16/18 | 0 | | | | | | | | | |
| FL3594241 | OVIEDO MARKETPLACE (CONSEC.) | CWS | 689 | 5/18/16 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 |
| FL3600007 | VILLAGE OF PINE RIDGE (CONSEC) | CWS | 4075 | 5/26/17 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| FL4434574 | PALM CITY FARMS PRODUCE | NTNCWS | 25 | 8/16/18 | 0 | | | | | | | | | |
| FL4505014 | SEM CHI/SUGAR FARMS | NTNCWS | 120 | 3/10/17 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| FL5084116 | TOWN AND COUNTRY UTILITY | CWS | 25 | 3/10/17 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| FL6095093 | DUKE ENERGY COMBINED CYCLE WTP | NTNCWS | 58 | 8/16/18 | 0 | | | | | | | | | |
| FL6296388 | ALBRITTON LABOR CAMP | NTNCWS | 76 | 11/16/15 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| FL6296389 | SHERWOOD MHP WEST | CWS | 45 | 2/22/16 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| FL6296396 | BAYAAN ACADEMY | NTNCWS | 44 | 9/1/17 | 0 | 0 | 0 | 0 | 0 | | | | | |
| FL6296400 | TAMPA GENERAL HOSPITAL | NTNCWS | 3700 | 11/30/17 | 0 | 0 | 0 | 0 | | | | | | |
| FL6412551 | HARBOR ISLES MASTER ASSOCIATION | CWS | 200 | 3/10/17 | 1 | 1 | 0 | 0 | 0 | 0 | 0 | | | |
| FL6535744 | BORAL ROOFING 2 | NTNCWS | 25 | 8/16/18 | 1 | | | | | | | | | |
| FL6535748 | MULBERRY RAILCAR | NTNCWS | 30 | 5/18/18 | 0 | 0 | | | | | | | | |

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Garnett, Becky

From: Sanderson, Eric <ELS@adem.alabama.gov>
Sent: Thursday, August 9, 2018 3:54 PM
To: Garnett, Becky
Cc: Story, S Scott; Jones, Heather M; Kitchens, Jeff; Dean, Glenda; Cobb, Steve
Subject: Biosolids Issue in Walker County Alabama
Attachments: P-3910_Cane_Creek_Mine_biosolids_schematic.pdf; IMG_0120.JPG; IMG_0116.JPG; IMG_0117.JPG; IMG_0121.JPG; IMG_0122.JPG; IMG_0123.JPG; The following is a Best Management and Practices Plan for stockpiling co.....docx

Becky,

I appreciate you taking the time to talk with me concerning the biosolids issue described below. I have attached pictures of the property in question which were taken during a recent inspection by ADEM, as well as the submitted Best Management Practices (BMP) plan for the stockpiling of the biosolids. I will keep you updated as we receive new information. Please let me know if you have any questions and/or concerns.

Thanks,

Eric

Eric Sanderson, P.E.
 Chief, Solid Waste Branch
 Land Division
 Alabama Department of Environmental Management
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The Following is a description of the planned process to remove the stockpiled biosolids at the Wistar Rd. property near Parrish, AL in Walker County as provided by Big Sky Landfill:

Big Sky Environmental, LLC had a lease and operating agreement with the owner of the property at Wistar Rd. to receive both Class A and Class B Biosolids at that location. This agreement included usage of the property for land application of the biosolids utilizing a written land application plan. Material stockpiling at the Wistar Rd. property began 2nd week in April 2018.

We are currently working with the property owner to develop a plan to remove the stockpile. The proposed plan is to treat/stabilize the Class A and Class B mixture of biosolids using lime to produce an unrestricted Class A product. After blending the biosolids with lime, separate piles will be placed under shelter protecting the resultant product from weather. Immediately after monitoring PH levels in accordance to the guidelines provided by EPA's part 503 for pathogen reduction, samples of the new Class A material will be submitted to a local lab to verify total metals content, nitrogen, and

fecal coliform levels are at acceptable levels under the EPA's 503 Rule. Once proper levels for these 3 key components is achieved and verified, the result will be an unrestricted Class A product that could be spread/stored as granular fertilizer.

By the end of this month (August 2018) we should have established a covered area and begin adding lime to create sample piles of the new (class A) material under the covered areas.. Once the material is proven as Class A and ...weather permitting of course ...the property owner plans to land apply the unrestricted Class A product over what was a strip mine resulting in improved land usage.

We expect to have a proven class A and application underway by 2nd week of September 2018.

ADEM will be kept posted on the progress of the above project.

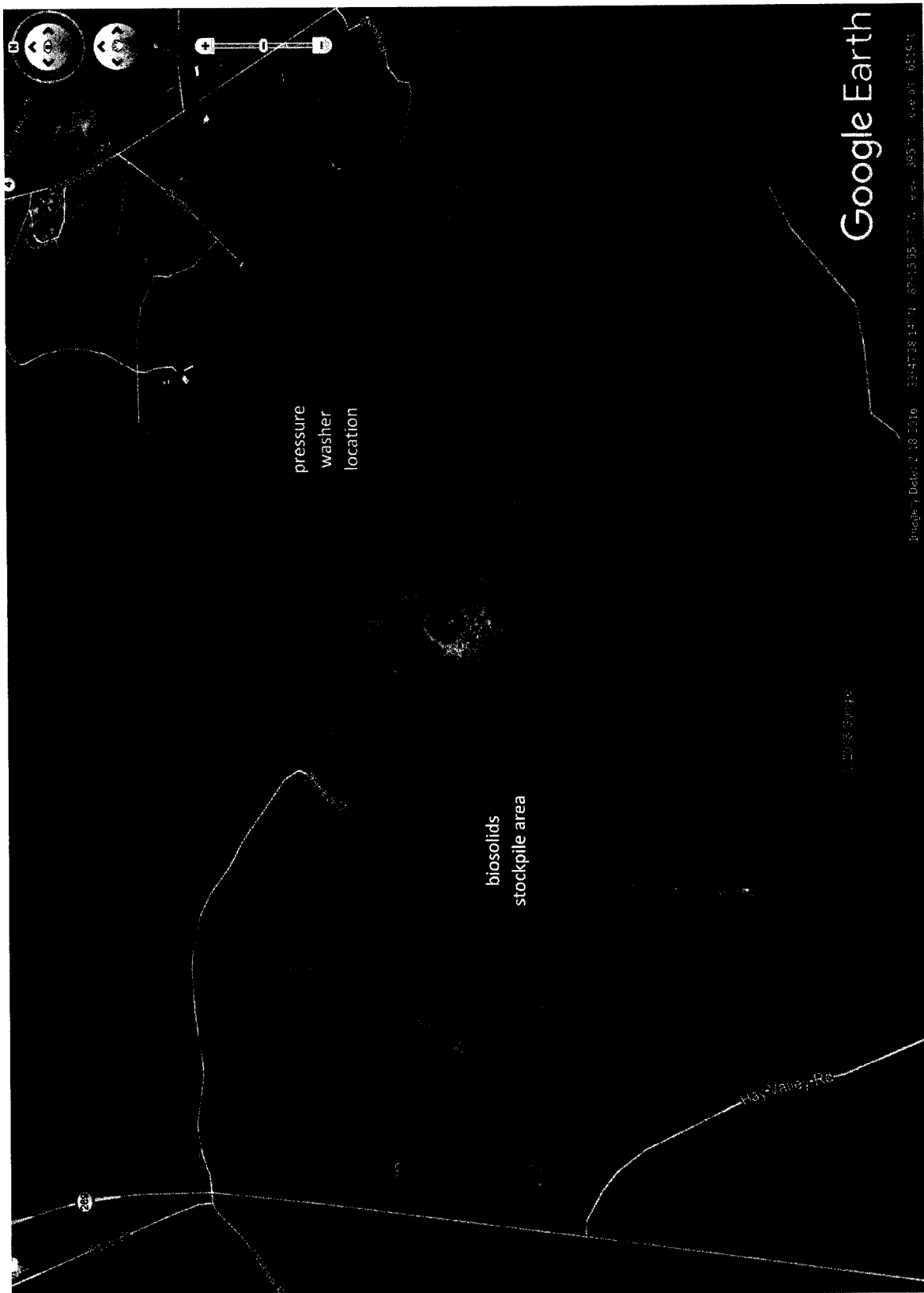
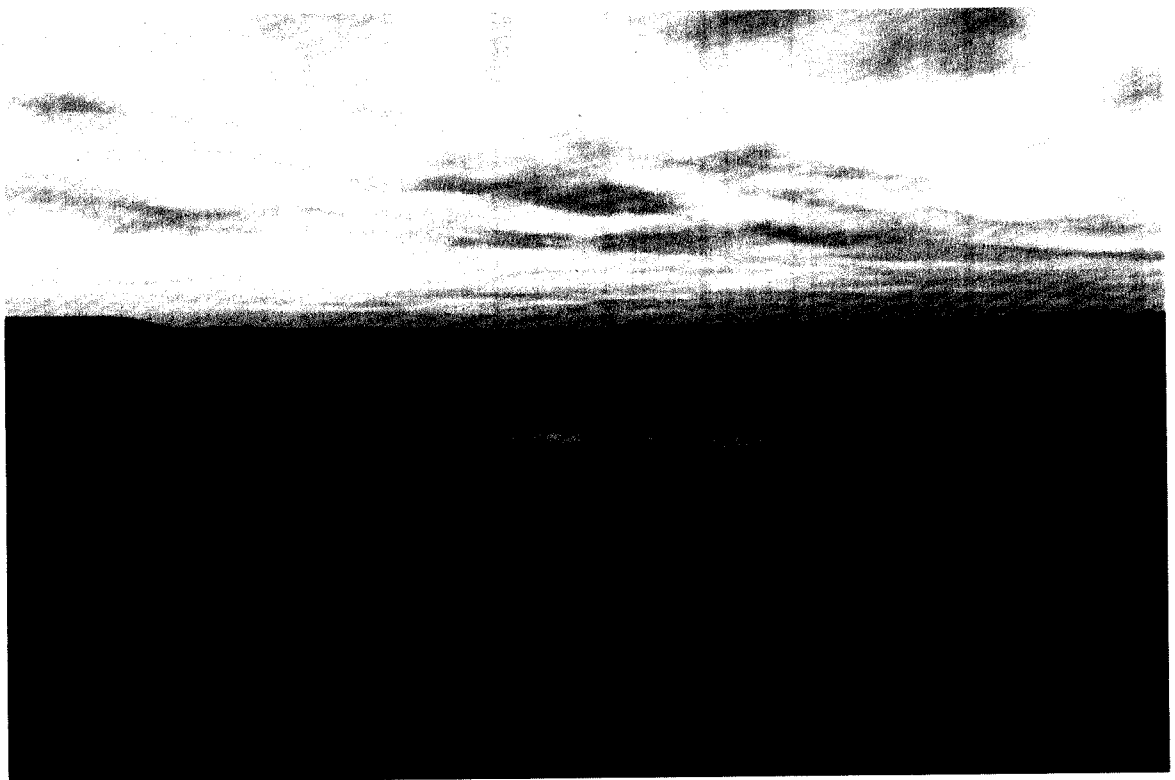
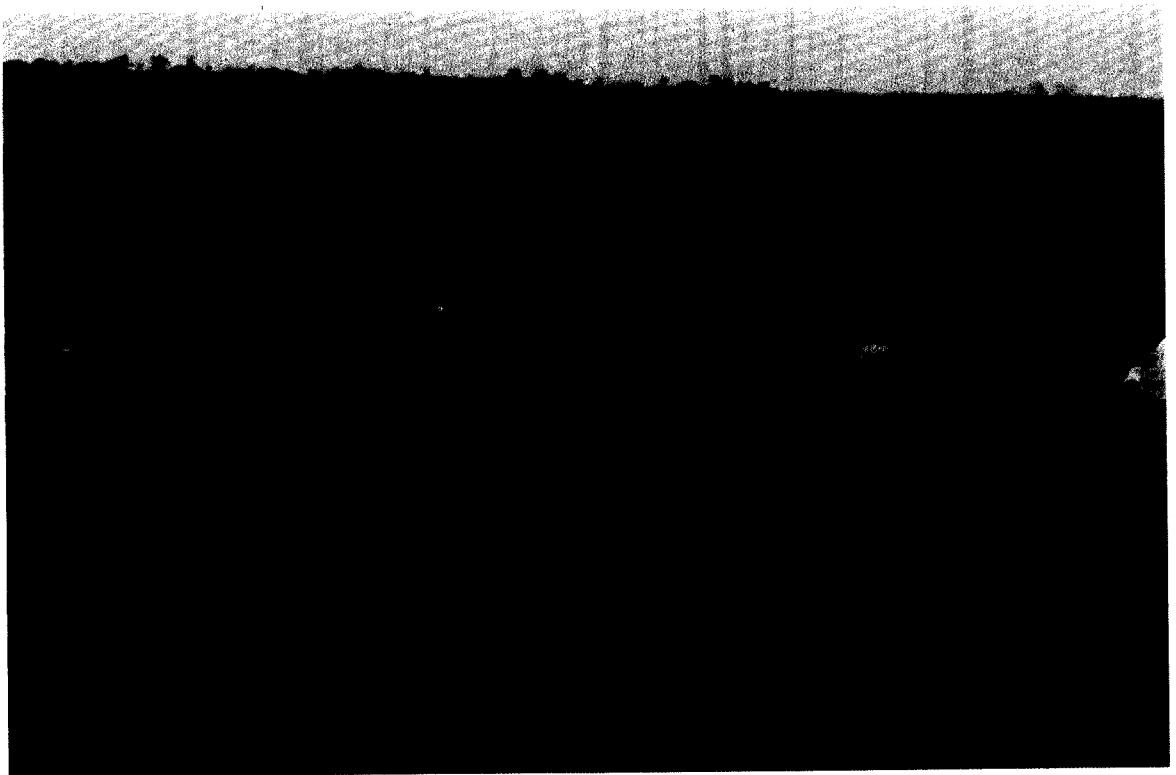
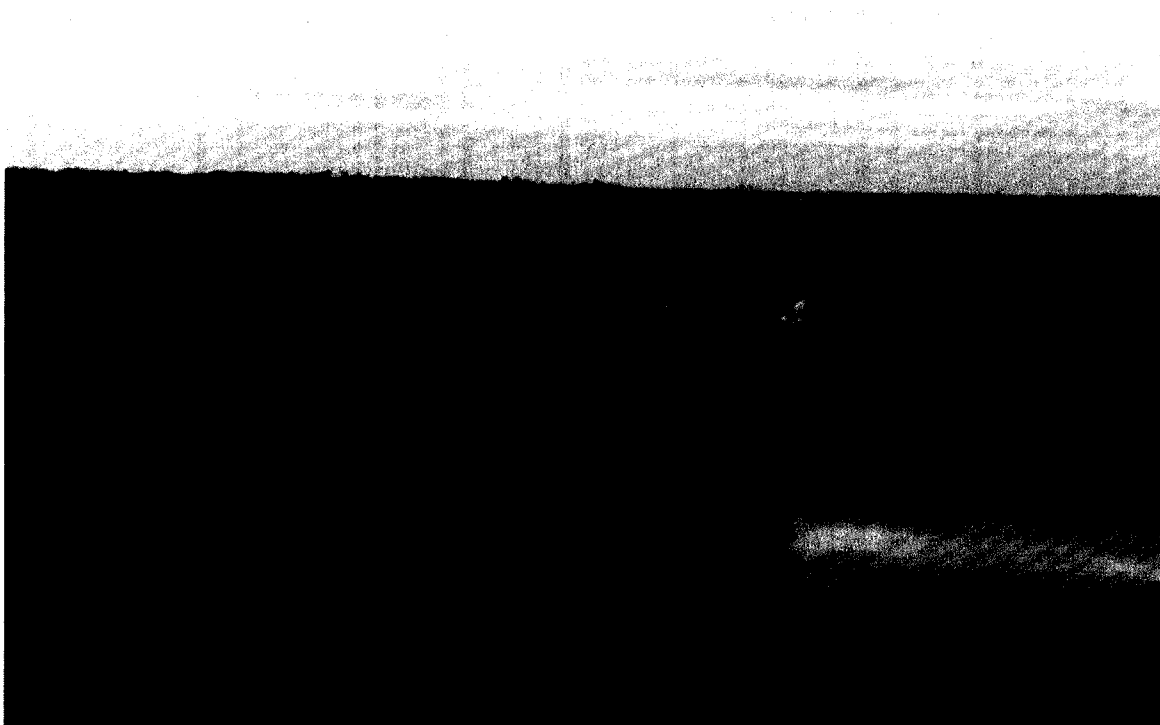
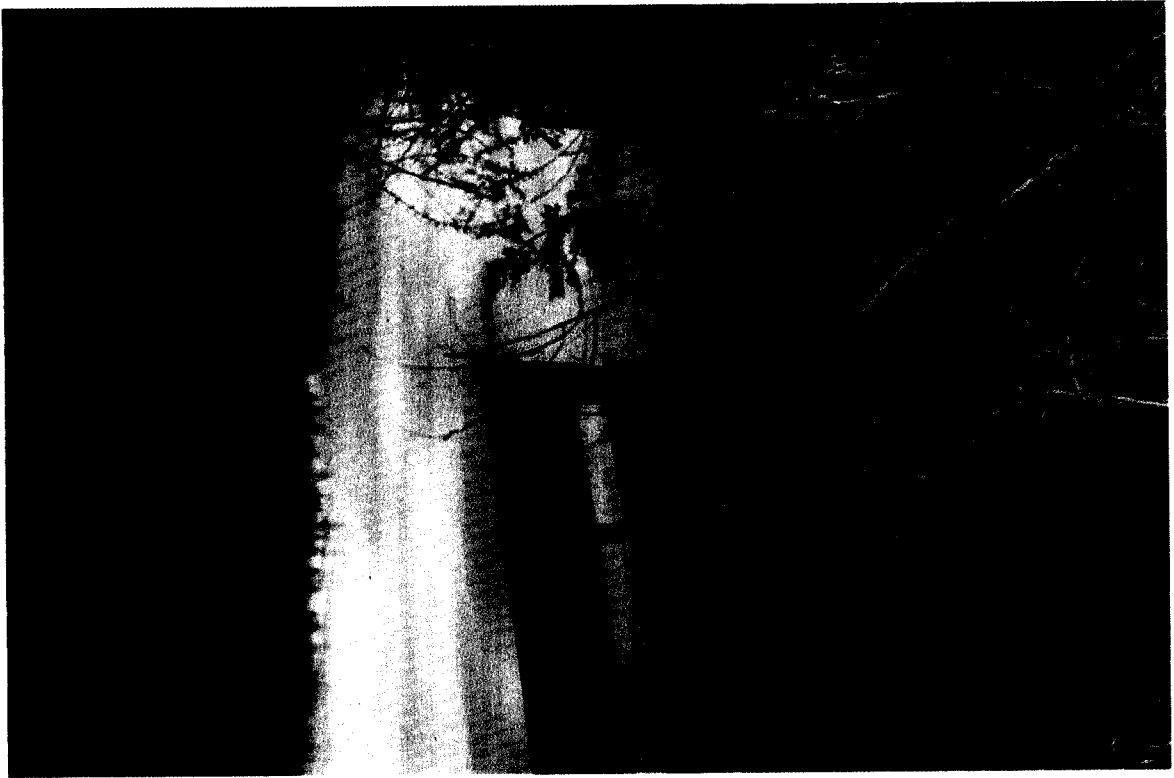
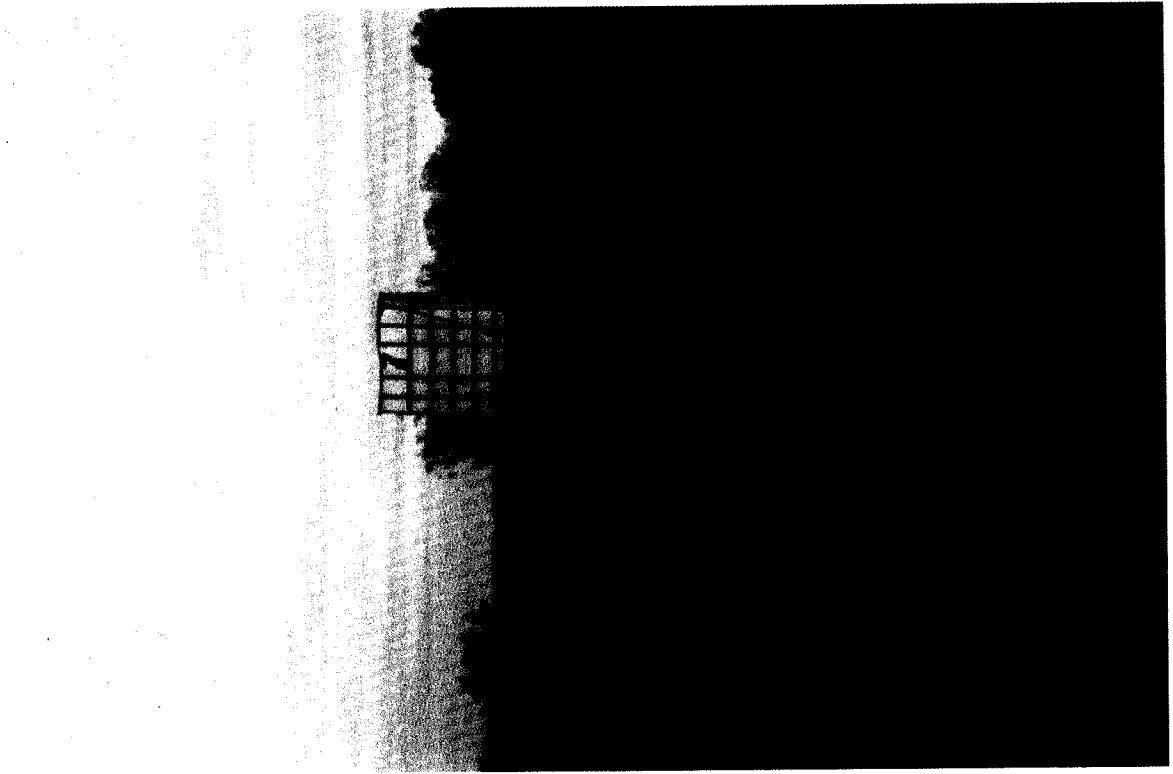


Image © 2016, Data © 2016, 53°47'28.14" N, 89°15'55.77" W, 395 ft, 6.6 km, 6.5 km







Best Management and Practices Plan for Stockpiling Compost and Biosolid Materials

The following is a Best Management and Practices Plan for stockpiling compost and biosolid materials on properties owned by Dan Burton of Walker County, Al. Note that this is a temporary plan for stockpiling Class A and Class B biosolids along with composting additives such as mulch or lime to begin land application operations as per the Land Application Best Management and Practices Plan for Dan Burton Properties.

- Biosolids must be transported to the storage site in vehicles that are appropriate for the type of materials being transported.
- Field stockpiles shall not be in drainage ways or in wetlands. They should be placed on fairly level land. Stockpiles should be situated near the top of slopes to minimize exposure to up-slope runoff. An earthen containment berm may be advisable if the facility is located fairly close to a drainage-way, surface waters, or other sensitive feature.
- Materials should be stored in areas with adequate buffers, preferably with a buffer of vegetation. Buffers for stockpiling materials shall be no less than 100' from any neighboring property lines. Buffers for stockpiling materials shall be a minimum of 100' from any waterway or established body of water.
- Materials may be stockpiled to commence land applications once enough material is accumulated but not to exceed the potential to land apply all materials stockpiled in a 2 year period.
- Inspect for odors and conditions conducive to odors; apply chemicals or surface covering material to suppress odors if needed; consider the meteorological conditions and the potential for off-site odors when scheduling opening the storage pile
- Train employees to use appropriate sanitation practices; inspect for compliance
- Clean all vehicles and equipment before they exit onto public roads
- Use temporary fencing to exclude livestock from the stockpile area, where applicable; install signs; secure site appropriately
- Inspect buffer zones to ensure run-off is not moving out of bounds
- Inspect and maintain up-slope water diversions
- Minimize ponding and storage time to the extent feasible during hot, humid weather; manage accumulated water appropriately
- Use biosolids that stay consolidated and non-flowing; shape stockpiles whenever possible to shed water

Best Management and Practices Plan for Stockpiling Compost and Biosolid Materials

- Designate a competent public relations person; maintain communication with stakeholders; notify agencies of reportable incidents; explain actions taken to respond to citizens concerns or complaints
- Work with WWTP to maximize biosolids stability, consistency, and quality; direct batches to appropriate sites.
- Transportation; Clearly mark site access routes and stockpile areas; conduct spill drills
- Install signs and implement security measures to restrict public access
- Train employees to properly operate the site according to plan; conduct spill drills
- Attend to site aesthetics